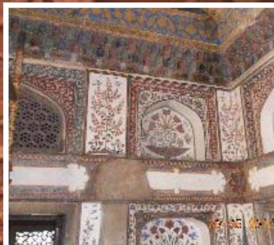






Report of the
Comptroller and
Auditor General of India
on

PERFORMANCE AUDIT OF
PRESERVATION AND CONSERVATION OF MONUMENTS AND ANTIQUITIES



Union Government (Civil)
Ministry of Culture

Report No. 18 of 2013
(Performance Audit)



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Contents



PREFACE

This Report of the Comptroller and Auditor General of India for the year ended March 2012 containing the results of the Performance Audit of Preservation and Conservation of Monuments and Antiquities has been prepared for submission to the President of India under Article 151 of the Constitution.

The Performance Audit was conducted during April 2012 to February 2013. The report emanates from scrutiny of files and documents pertaining to Ministry of Culture, Archaeological Survey of India, National Monument Authority, National Culture Fund, National Museum, Delhi, Indian Museum Kolkata, Salar Jung Museum Hyderabad, Allahabad Museum, Allahabad, Victoria Memorial Hall, Kolkata, Asiatic Society, Kolkata, Asiatic Society, Mumbai and Chhatrapati Shivaji Maharaj Vastu Sangrahalaya, Mumbai.



Executive Summary

Constitution of India stipulates that it shall be the duty of every citizen of India to value and preserve the rich heritage of composite culture. We thus, have a special responsibility for preservation of our heritage as one of our fundamental duties.

The Ministry of Culture is responsible for the preservation and conservation and promotion of Indian heritage and culture. The Ministry through the Archaeological Survey of India and the Museums is engaged in the protection of all centrally protected monuments of national importance, excavation of historical sites and collection and showcasing the art objects of historical and cultural importance. Through this performance audit, we evaluated the efforts of the Ministry of Culture towards protection, conservation and preservation of country's tangible heritage of monuments and antiquities.

Why did we select this topic?

Heritage structures, sites and antiquities are national assets. The work on heritage identification and preservation started in mid nineteenth century in India much before the independence. However, since independence, the progress made over the years had not been reviewed comprehensively. In the recent times, there has been an increased consciousness in the Indian community towards the heritage and its conservation. In 2012, ASI completed 150 years of existence. Many of its major excavation projects were, however, lying incomplete for years. The preservation projects being undertaken by the ASI too have been marred by several inadequacies and limitations. The organisation has serious funds and manpower shortages for the conservation related activities. There is also a rising trend of incidences of antiquity theft and smuggling of antiquities from the country. Country's premier museums lack resources and planning for proper upkeep, security and display of collected art objects.

Noting the above scenario, we planned this performance audit with the aim to assist the executive in identifying the reasons behind deficient performance of the organisations in the field of heritage preservation and conservation for enabling effective rectificatory steps.

What has been covered in this audit?

The performance audit included a joint physical inspection of 1655 monuments and sites out of the 3678 centrally protected monuments and sites spread nationwide

over 24 ASI Circles. These Monuments and Sites were selected for site inspection on the basis of their historical importance and geographic spread. Seven museums[1] were also included in this physical inspection. Records of the ASI and its offices, the Ministry of Culture, Museums and other associated organisations viz., the National Monument Authority and National Culture Fund for the period 2007-08 to 2011-12 were test checked for this performance audit.

How is the Report organised?

Chapter I of this Report provides background information, audit approach, and details of sample selection. Chapters II to X provide overall audit findings on predefined audit objectives dealing with the themes of preservation and conservation of monuments and antiquities, management of excavation project, funding, functioning of the major museums and monitoring. In Chapter XI we have attempted to examine the governance issues at level of the Ministry and its responsiveness to the recommendations given by various Committees, Court Rulings and earlier CAG Reports. Chapter XII presents the conclusions. The Report contains 61 recommendations.

Highlights of audit findings

- We noted that the Ministry through the ASI had not conducted a comprehensive survey or review to identify monuments which were of national importance for inclusion in the list of centrally protected monuments. Similarly, there were no efforts to identify those monuments which had lost the stature of national importance over a period of time.

(Para 2.1)

- The ASI did not have a reliable database of the exact number of protected monuments under its jurisdiction. In the absence of this primary information, we were unable to conclude if the ASI was able to fulfill its basic mandate effectively.

(Para 2.2)

- During joint physical inspections we found that out of the sample of 1655 centrally protected monuments selected by us, 92 monuments (6 *per cent*) were not traceable. This was far higher than the number communicated to the Parliament by the ASI.

(Para 2.5)

[1] National Museum, Delhi; Indian Museum, Kolkata; Victoria Memorial Hall, Kolkata; Asiatic Society, Kolkata; Asiatic Society, Mumbai; Salar Jung Museum, Hyderabad and Allahabad Museum, Allahabad.

- The World Heritage Sites did not receive appropriate care and protection. There were numerous cases of encroachment and unauthorised construction in and around these sites. We found that a comprehensive assessment of preservation works that were required had never been carried out.

(Para 3.4)

- The ASI did not have an updated and approved Conservation Policy to address the conservation and preservation requirements. We noted the absence of any prescribed criteria for prioritisation of monuments which required conservation works. As a result, monuments were selected arbitrarily for carrying out conservation works. Further, many monuments were never considered for any kind of structural conservation despite need for the same.

(Para 4.1.1)

- Inspection notes on the condition of monuments were not being prepared by the ASI officials. There was poor documentation of the conservation works. Even basic records such as measurement books, log books and site registers were not being maintained properly. As a result, we could not conclude if the monuments selected for conservation works were need based nor could we ascertain the propriety and genuineness of the expenditure incurred on conservation works.

(Para 4.1.1 & 4.1.2)

- One of the primary activities of the ASI was exploration and excavation of the remains in the country and their study. However, we observed that the ASI was spending less than one *per cent* of its total expenditure on such activities.

(Para 5.3)

- We observed poor documentation of the excavation works carried out by the ASI. The ASI HQ could not provide the status of 458 excavation proposals approved during the last five years. Similarly, complete information was not available on the status of pending excavation reports. We also noted numerous cases of excavation proposals not being undertaken or left incomplete.

(Para 5.4.1 & 5.8)

- The ASI did not have a Comprehensive Policy guideline for the management of Antiquities owned by it. There were no standards for acquisition, preservation, documentation and custody of objects possessed by the ASI. During site inspections we noticed valuable antiquities found during excavations being stored in poor condition.

(Para 6.1.1)

- We observed significant shortcomings in the functioning of Museums in relation to acquisition, documentation and conservation of acquired art objects. Most Museums did not have a system in place for the evaluation of acquired objects to verify their genuineness. We were, therefore, unable to derive any assurance on the authenticity of the artifacts acquired.

(Para 6.2.3)

- Proper maintenance of the accession register was essential to correctly account for the Museum objects and also for their safety. However, systematic maintenance of the accession register was largely absent in the museums. We observed significant discrepancies in the number of antiquities reportedly available in the Indian Museum, Kolkata, National Museum, Delhi and Asiatic Society, Kolkata and those available as per their database.

(Para 6.5.1)

- There was no laid down policy for systematic conservation and restoration of the artifacts which resulted in their deterioration.

(Para 6.8)

- The ASI, as the custodian of antiquities, did not even maintain a database of the total number of antiquities in its possession. In the absence of centralised information, there was a significant risk of theft or loss of these antiquities. During our inspections, we found that 131 antiquities were stolen from various monuments/sites and 37 antiquities from site museums. However, the efforts of the ASI to retrieve these items were completely ineffective.

(Para 6.10.2 & 6.11)

- Museums did not evolve a rotation policy for displaying artifacts in galleries. As a result, more than 95 *per cent* of objects were lying in reserve, in some of the audited museums without ever having been put on display.

(Para 6.14.1)

- There were acute shortages of staff in all key positions in the ASI. This adversely affected the security and maintenance of monuments. Shortage of staff was also noticed in some of the museums and other organisations like NMA.

(Para 8.1.1 & 8.6)

- Governance from the Ministry of Culture was lax and was found deficient on aspects of adequacy of policy and legislation, financial management, monitoring of conservation projects and provision of human resources to these organisations.

(Para 11.1)

- Over the years, shortcomings related to the functioning of the ASI and museums had been highlighted by various expert/Parliamentary Committees. However, Ministry failed to take note of these red signals for initiating corrective measures.

(Para 11.1.4)

Summary of Recommendations:

- The lists of protected monuments should be updated and reconciled periodically so that there was no ambiguity with regard to the number of protected monuments under each Sub Circle, Circle and the ASI as a whole.
- The ASI should make a provision for inspection of each protected monument by an officer of suitable level periodically. The ASI should publish the state of each monument being protected by it on the basis of detailed inspection note and photographic evidence collected during such inspection on a regular basis.
- The ASI should have a laid down policy for notification of sites with contested ownership or occupants. These sites can be placed in the tentative list for nomination till all disputes are resolved.
- There is an urgent need to come up with a written agreement with the management of the sites with restrictive entry, to enable access to these sites by common visitors. The ASI also needs to develop policy for maintaining such sites.
- It is inevitable that changes would be carried out in the protected monuments if they are to be also used as offices and residences. For these exceptions, the ASI should prepare detailed guidelines and get the Act revised appropriately.
- The notification is an important document which not only provides a legal status for centrally protected monument but also defines the area of the site. This document is crucial for establishing encroachment or unauthorised construction at the site. The ASI should maintain a centralised database of all notifications and records related to the sites which should be readily available with the ASI HQ.
- There should be no room for ambiguity and difference in factual information related to the monuments. The ASI should collect the MIS data from its Circles on each of the protected monument and place it in public domain after reconciling the discrepancies.
- The Ministry should come up with a strategy to ensure time bound completion of heritage by-laws for all protected monuments and their speedy approval.
- The ASI should define objective criteria and requirements for selection of sites for the tentative list and from the tentative list for final inscription of World Heritage Site, as this will help in prioritising, planning and preparing the sites before nomination.

- The ASI should adopt a systematic approach for the development of tentative world heritage sites through conservation and site management. This alone can ensure final inscription of the site.
- The Ministry should develop a separate project for maintenance and security of World Heritage Sites. There should be proper assessment of funds, security and conservation requirements.
- The Ministry should develop a Comprehensive Conservation Policy and update its manuals and works code. The ASI should make it mandatory to maintain log books for each protected monument with detailed documentation of all conservation efforts.
- To be effective, the ASI needs to prioritise its projects requiring funding through NCF. For this, a comprehensive assessment of funds needs to be carried out in advance.
- There should be detailed guidelines on management of 'living' monuments.
- Documentation on 'non-living' monuments should be properly maintained to curb instances of unauthorised possession and use.
- The Ministry should ensure finalisation of the National Policy on Archaeological Excavation and Exploration expeditiously.
- The ASI may consider devising mechanisms for preparing a priority list for excavation projects based on importance of the site. The list may be updated annually.
- A protocol is required for handing over and maintenance of antiquities with laid down responsibilities and accountability for loss. Proper arrangement needs to be made for storing these antiquities.
- The ASI may prepare an inventory of the excavated antiquities and their locations and put it in public domain so as to facilitate its use for reference/research by scholars.
- The ASI needs to enhance the use of modern scientific technology, build capacity of its officials and establish an upgraded dating laboratory of its own.
- The provisions of AAT Act and the International Conventions should be reviewed in order to make the legislation more contemporary and effective and to facilitate restoration of stolen art objects from other countries.
- The Ministry should expedite the work of registering antiquities and devise procedures for ensuring the genuineness of the registered antiquities in a time bound manner. Electronic format may be considered for the purpose.
- The ASI should develop a centralised and digitised data base of antiquities to document all details of antiquities stored at different locations.

- There is a need for a more concerted approach for retrieval of Indian art objects stolen or illegally exported to other countries. The ASI, as the nodal agency for this purpose needs to be more proactive and vigilant in its efforts and the Ministry needs to develop an aggressive strategy for the same.
- The Ministry should frame a comprehensive policy for Management of Antiquities owned by different central museums.
- The ASI needs to develop detailed guidelines for the functioning and establishment of site museums.
- The Museums should adopt a rotation policy for the display of artifacts. It should device mechanism for proper and attractive display methods to attract visitors.
- The reserve collection should also be properly maintained and preserved in suitable storing conditions.
- The ASI should frame clear norms and guidelines for designating a particular monument as ticketed, with a view to enhance the revenue realisation from sale of entry tickets.
- The ASI needs to revise the rates for film shooting and ticketing to make it a substantial source of revenue.
- The Ministry needs to diversify and explore on the new modes of revenue generation from the Heritage Sites and Museums. Options should be explored in view of best practices adopted globally.
- The Ministry should take immediate steps to resolve manpower shortages especially in the crucial cadres engaged in Conservation related works.
- The ASI should constitute a coordination body with representatives of respective State Governments at each Circle to check the incidents of encroachments with the cooperation of District and Police authorities.
- There should be regular monitoring of existing encroachment cases by the Ministry at the highest level. Encroachment by State Government agencies or other Government of India agencies should be sorted out in a time bound manner by raising the matter at higher levels.
- There should be a security plan for each monument, taking into account its location, area, structure, footfall and other vulnerabilities. This exercise should be performed in house by the ASI to ensure coverage of ground level realities.
- The Museums should adopt appropriate security measures to provide protection against theft, damage and losses. The Ministry should take initiative in development of a comprehensive security policy for museums with uniform standards for all museums under its control.
- The ASI should have funds earmarked specifically for awareness, interpretation and related activities.



CHAPTER – I

Introduction

Our heritage is an indispensable part of our identity. World over, heritage conservation is viewed as a subject of utmost importance for national identity and also for preserving the knowledge and arts of the past. According to United Nations Educational, Scientific and Cultural Organisation (UNESCO), culture and development cannot be separated, either in terms of economic growth or as a means of access to a satisfactory intellectual, moral and spiritual existence. Development involves the capabilities that allow groups, communities and nations to plan their future in an integral and integrated way. Thus, heritage conservation can be seen as a cross-cutting factor in economic, social and environmental development.

The Ministry of Culture (Ministry) is responsible for preservation, conservation, promotion and dissemination of all forms of art and culture in the country. The Ministry, through the Archaeological Survey of India (ASI) is engaged in protection of all the centrally protected monuments of national importance and excavations of historical sites. Through various museums it is ensuring collection, preservation and display of antiquities.

The ASI, an attached office of the Ministry, was established in 1861 with the primary objective of conservation, preservation and maintenance of the centrally protected monuments. The ASI's jurisdiction includes 3678 centrally protected monuments and archeological sites as varied as megalithic sites, burials, rock cut caves, stupas, temples, mosques, churches, forts, water systems, pillars, inscriptions, relics, monolithic statues, sculptures. Conservation of a monument or a site is a continuous process and yearly programs for this are drawn by the Circles and Branches of the ASI.

The ASI has undertaken works for structural conservation, chemical preservation and horticultural operations based on the priorities, commitments and available manpower and financial resources. The ASI has 19 World Heritage Sites under its protection.

In 2011, the ASI celebrated 150 years of its existence. The work on heritage identification and preservation in India started in mid nineteenth century. However, there has been no comprehensive independent scrutiny of Government's efforts and performance of the organisations engaged in the work of heritage conservation.

Approximately 33 *per cent*[1] of the total budget of the Ministry was utilised for the functioning of the ASI. Another six *per cent* was given to the seven major museums of the country. Together, these institutions are repository of our country's invaluable heritage and treasures.

1.1 Organisations Covered in this Audit

The Ministry of Culture functions with a set up of various attached offices, sub-ordinates offices and autonomous bodies under its administrative and financial control. The Chart 1.1 shows the organisational structure of the Ministry depicting the organisations/ bodies covered under audit.



Chart 1.1: Entities Covered in this Performance Audit

The Archaeological Survey of India is the apex organisation engaged in the work of preservation of monuments and protected sites. For the maintenance of ancient monuments and archaeological sites and remains of national importance, the entire country is divided into 24 Circles and one mini Circle (Leh). The Circles represent the structural conservation Divisions. In addition, there are 10[2] Directorates for specialised activities.

[1] As per Budget Estimates for the year 2011-12

[2] Directorate of Horticulture, Science, Epigraphy, Excavation, Museum, Publication, Monument, World Heritage Sites, Conservation and Antiquity

The ASI is headed by a Director General who is supported by Additional and Joint Directors General. Each Branch is headed by Directors. The Circles responsible for the maintenance of the monuments and structural conservationare headed by Superintending Archaeologists supported by Engineers and Conservators. The Circles are further divided into the Sub Circles headed by Conservation Assistants who are directly responsible for the activities carried out at the monuments.

Besides the Circles, there are six Excavation Branches, two Temple survey projects, a Building survey project and a Pre history Branch. Directorate of Epigraphy has branch offices at Nagpur, Lucknow and Mysore. Directorate of Horticulture has four Divisional offices at Agra, Delhi, Mysore and Bhubaneswar. Directorate of Science has three divisional offices and 11 zonal offices. From April 2010, the ASI also established regional offices of Museum branch at Delhi, Sarnath, Goa and Chennai. We noted that in October 2012 a decision was taken to merge these with the Circles.

The Ministry also functioned through other organisations under its control, constituting various central Museums, National Culture Fund (NCF) and National Monument Authority (NMA). The details of these organisations are given in **Annex-1.1.**

1.2 Legal Framework

1.2.1 Constitutional Mandate

As per Article 51 A (f) of the Constitution of India, **'It shall be the duty of every citizen of India to value and preserve the rich heritage of our composite culture.'**

In Independent India, the Constitution divided the jurisdiction over these monuments and archaeological sites as follows:

- **Union : ancient and historical monuments and archaeological sites and remains, declared by Parliament by law to be of national importance;**
- **State: ancient and historical monuments other than those declared by Parliament to be of national importance.**
- **Besides these, both the Union and the States would have concurrent jurisdiction over archaeological sites and remains other than those declared by Parliament by law to be of national importance.**

The important enactments promulgated to protect and preserve archaeological sites are as follows:

- The Indian Treasure Trove Act, 1878-First legislation post-establishment of the ASI enacted to protect and preserve treasure found accidentally but having archaeological and historical value.

- The Ancient Monuments Preservation Act, 1904 -Enacted to provide effective preservation and authority to the ASI over the monument particularly those, which were under the custody of individual or private ownership.

- The Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National Importance) Act, 1951.

- The Ancient Monuments and Archaeological Sites and Remains (AMASR) Act, 1958-Enacted on 28 August 1958, the Act provides for the preservation of ancient and historical monuments and archaeological sites and remains of national importance, for the regulation of archaeological excavations and for the protection of sculptures, carvings and other like objects. The Act was followed by AMASR Rules 1959.

- The Antiquities and Art Treasures (AAT) Act 1972 -Enacted in September 1972 for effective control over the moveable cultural property, consisting of antiquities and art treasures. The AAT Act was followed by AAT Rules 1973 which were enforceable with effect from 5 April 1976.

- The AMASR (Amendment and Validation) Act, 2010 -The Act prescribes the limits of regulated and prohibited area around a monument by amending section 20 of AMASR Act 1958. It also provided for creation of National Monument Authority.

The important provisions of the AMASR Act and the AAT Act are given in **Annex-1.2.**

1.3 Audit Approach

1.3.1 Audit Objectives

The Performance Audit was conducted with the objectives to ascertain:

- Adequacy of efforts to identify, document, protect, preserve and showcase monuments of national importance.

- Proper management of excavation projects with due documentation, preservation and protection of antiquities and excavated sites.

- Existence of proper institutional and monitoring mechanism to ensure heritage conservation and for exploring new avenues in this field.

- Effective and efficient functioning of the major Museums of the country and the Site Museums of the ASI withdue acquisition, preservation, conservation and security of art objects being collected by them.

- Performance of the Museum movement with respect to its stated objectives of displaying the collection of antiquities and educating the people through it.
- Proper financial management including adequacy of funds for conservation projects, utilisation of funds, revenue generation, remittance of revenue in Government account and accounting thereof.

1.3.2 Sources of Audit Criteria

The performance of the ASI was evaluated with reference to the criteria derived from the following sources of documents:

- Acts, Rules and Regulations for Monuments and Antiquities;
- Various guidelines in respect of maintenance and upkeep of Antiquities;
- Manuals related to the conservation of Monuments and Antiquities like Archaeological Works Manual and John Marshalls Conservation Manual;
- Archaeological Works Code and Central Public Works Department (CPWD) Manual;
- International Charters, e.g., International Council on Monuments and Sites (ICOMOS) and International Centre for the study of Preservation and Restoration of Cultural Property (ICCROM); and
- Rules and regulations of the Central Government, as applicable.

1.3.3 Scope of Audit

The Performance Audit was restricted to the centrally protected monuments of national importance protected and preserved by the ASI[3]. For antiquities, we covered seven Museums[4] under the control of the Ministry and 44 Site Museums under the control of the ASI. Functioning of Chhatrapati Shivaji Maharaj Vastu Sangrahalaya, Mumbai a private organisation[5] was also looked into to draw comparisons with other museums managed by the Ministry. The period covered under audit was from 2007-08 to 2011-12. The records of earlier period and till the date of audit were also scrutinised wherever required to draw conclusions.

The performance audit also covered audit of National Culture Fund and National Monument Authority.

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3 This audit did not cover the state protected monuments and the unprotected monuments.

4 National Museum, Delhi, Indian Museum, Kolkata, Victoria Memorial Hall, Kolkata, Allahabad Museum, Allahabad, Salar Jung Museum, Hyderabad, Asiatic Society, Kolkata and Asiatic Society Mumbai

5 The Museum received grants from the Ministry for its modernisation project

1.3.4 Audit Methodology

The entry conference with the Secretary to the Government of India (Ministry of Culture) was held on 16 May 2012 wherein the audit objectives, scope and methodology were explained. Separate entry conferences were held with the DG ASI and Heads of all the seven Museums.

The audit teams scrutinised the records of different sections/branches of the ASI as well as of the seven Museums. The performance audit also encompassed joint physical inspection of the monuments and antiquities carried out by the audit teams along with the officials of the concerned departments.

After completion of audit an Exit conference was held on 3 June 2013 with the Ministry of Culture, ASI and heads of other museums to discuss the audit findings. Responses received from the audited entities have been considered while preparing this Report and these have been included to the extent feasible.

1.3.5 Audit Sampling

A sample of monuments and sites for joint physical inspection with the ASI officials was selected in view of their historical importance and geographic spread. Out of the 3678 monuments notified by the ASI, joint physical inspections of 1655 monuments (45 per cent) were carried out. The circle wise details are given in **Annex-1.3**.

1.3.6 Audit Constraints

Despite our repeated requests, the following information and records were not provided to us:

Name of the organisation	Details of records/information not provided
Archaeological Survey of India	• Records related to details of the monuments along with notification numbers etc. for the Bengaluru, Bhopal, Chennai, Dharwad, Hyderabad, Lucknow, Patna and Srinagar Circles. • Files and records related to preparation of World Heritage Site: nomination dossier[6] for Rani-ki-vav, Gujarat and Qutb Shahi, Hyderabad.

[6] A document containing information required by UNESCO for inscribing any monument/site as a WHS

	• Files and records related to preparation of Integrated Management Plan for Champaner Pavagarh, Gujarat. • Records related to selection of Consultants in 2002 and 2006 for World Heritage Site nomination for Majuli, Assam. • Report submitted by Shri Prakash Chand, Consultant for restructuring and reorganisation of the ASI in 2012 and action taken thereon. • Recommendations of Wheeler committee of 1965 and action taken thereon by the ASI. • Report submitted by the committee constituted in 2012 to review the security arrangement and assess the performance of private security guards at ASI. • Information with regard to Kos Minars of Agra Circle. • Details of full time security guards deployed at monuments.
National Monument Authority	• Files and records related to the appointment and selection of consultants for technical and administrative works. • Files and records in respect of the cases where NMA recommended for rejection of NOCs. • Files and records in respect of the cases where the applications were returned seeking more information.
National Museum	• Information on the 'AA' category objects

In the absence of these records, we were unable to provide assurance that due processes were followed and the applicable rules and regulations adhered to by the concerned departments in these cases. Further, this constituted a limitation on the scope of audit.

1.4 Acknowledgement

We acknowledge the co-operation and assistance of the Ministry of Culture, Archaeological Survey of India and their field staff, National Monument Authority, National Culture Fund, National Museum, Indian Museum, Salarjung Museum, Allahabad Museum, Victoria Memorial Hall, Asiatic Society Kolkata, Asiatic Society Mumbai and Chhatrapati Shivaji Maharaj Vastu Sanghralaya (CSMVS) for the completion of this audit. The inputs provided by field level staff during joint physical inspection were specially found very useful in gaining an understanding of the conservation process.



CHAPTER – II

Identification and Protection of Monuments and their documentation

For appropriate protection and conservation of monuments and sites, the first step was their identification. The AMASR Act, 1958 authorised the Central Government to designate the "Monuments of National importance".

2.1 Monuments of National Importance

According to section 3 of the AMASR Act, 1958, all ancient and historical monuments and all archaeological sites and remains which had been declared by the Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National Importance) Act, 1951 or by Section 126 of the State Re-organisations Act, 1956 to be of national importance shall be declared to be of national importance.The Act stated that ***protected monuments*** should be the ancient monument and archaeological sites and remains which are of historical, archaeological or artistic interest and which have been in existence for not less than 100 years. However the Act did not define the term "national importance" in objective terms with a defined set of criteria. Even the Ministry so far had not specified any detailed criteria for declaring any monument to be of national importance.

We also noted that the Ministry through ASI had not conducted any comprehensive survey or review for identifying monuments which were of national importance for inclusion in the list of Centrally Protected monuments. There were no standing instructions for the ASI Circles to look for and recommend such unprotected monumentsfor notificationon a regular basis.

We found that a detailed review was also required to de-notify monuments which were brought to protection prior to independence and had lost importance over time.

The Ministry (May 2013) agreed that there was an urgent need to review and survey all the ancient monuments and archaeological sites declared as of national importance whether they still continue to be of national importance.

2.2 Protected Monuments

The AMASR Act authorised the ASI to declare a monument to be of national importance by issuing a notification in the Gazette of India. Thereafter, activities

relating to preservation and conservation of monuments were to be undertaken. We noted that the ASI did not maintain a reliable database regarding the number of protected monuments.

Further, the information in respect of number of monuments provided by the ASI HQ was at variance with the information provided by Circle/Sub-Circle offices. The variations are shown in **Table 2.1**.

Table 2.1 Details of difference in number of protected monuments

Name of the Circle	Number of Monuments/Sites as per the ASI HQ	Number of Monuments/Sites as per Circle/Sub Circle	Discrepancy in number of Monuments
Bengaluru	208	218	10
Bhopal	292	290	2
Chennai	410	411	1
Dehradun	44	42	2
Delhi	174	149	25
Dharwad	299	300	1
Jaipur	163	162	1
Kolkata	136	137	1
Lucknow	365	358	7
Patna	182	183	1
Raipur	47	45	2
Ranchi	12	11	1
Trissur	36	37	1
Vadodara	214	213	1
Total			**56**

We observed further discrepancies in the figures of protected monuments provided by the ASI to the Ministry of Finance in 2006 and to the Parliament in June 2012.

The ASI stated (July 2012) that the discrepancies in the number of monuments were mainly due to non updating of list of monuments immediately after bifurcation of a Circle and changes in the jurisdiction of Circles due to creation of new Circles. The reply underscores the need to exercise better coordination with the Circles as timely updation of this basic information is important for various stakeholders.

Absence of details of the exact number of monuments under the control of the ASI would impinge on proper protection, preservation and conservation of these sites of national importance.

***Recommendation 2.1:** The lists of protected monuments should be updated and reconciled periodically so that there was no ambiguity with regard to the number of protected monuments under each Sub Circle, Circle and the ASI as a whole.*

2.3 Shortcomings in Notification and De-notification of Monuments

In terms of section 4 of the Act, if the Central Government was of the opinion that any ancient monument or site and remains not included in Section 3 was of national importance, it may, by notification in the official gazette, give two months' notice of its intention to declare such ancient monument or archaeological site and remains to be of national importance. A copy of each such notification shall be affixed in a conspicuous place near the monument or site and remains. On the expiry of the said period of two months and after considering the objections, if any, the ancient monument or the archaeological site and remains were declared to be of national importance. Thus, the notification gave the monuments or sites an official status of being "Protected". Examination of the system of notification and de-notification of monuments revealed the following deficiencies.

2.3.1 Notification Cases

No procedures were laid down for the Circles under the ASI, to send recommendations for the protection of monuments periodically. However, occasionally at the initiative of the Circle or based on a VIP reference, the ASI received detailed proposals from the Circles with an inspection note of Superintending Archaeologist (SA) (In-charge of the Circle).

These proposals were required to be scrutinised by a Committee of Officers (appointed by DG, ASI in 2006) with Joint DG as the Chairman. On the basis of recommendations of the Committee, approval of the Minister was sought to issue a preliminary notification in the official gazette. We found that the committee had held only four meetings since 2006. Out of the 78 proposals submitted by various Circles since 1996 for the protection of monuments; only 53 were submitted to the Committee for consideration. The other proposals were rejected even before consideration of the Committee for which no reasons were available on record. The details of the proposals scrutinised and recommended by the Committee were as follows:-

Table 2.2 Details of notification proposals scrutinised and recommended

Date of the meeting	Proposals scrutinised	Proposals recommended
30 May 2007	6	2
11 January 2008	14	6
23 September 2008	31	24
22 May 2012	2	2
Total	53	34

However, only 2 monuments out of the 34 recommended by the Committee since 2007 were notified till date. We noted inordinate delays in processing of cases for notifications with some cases pending for more than 16 years, as proposals submitted by Circles/offices were pending since 1996.

In nine cases preliminary notification proposals were approved by the Prime Minister (then Minister of Culture) in 2009 but only one monument out of these nine was notified till 2012.

The Ministry (May 2013) stated that the proposals received from the Circles were not taken on record as these were incomplete and had been sent without completing the formalities. In many cases the justification given was unreasonable. The reply is not valid as we did not find any evidence in the records that the stated deficiencies had been communicated to the concerned Circles for taking corrective measures.

2.3.2 De-notification cases

According to Section 35 of the AMASR Act 1958, in case the Central Government was of the opinion that any ancient and historical monument or archaeological site and remains had ceased to be of national importance, it may declare so.

We noted that over the past 46 years, Circles had submitted 26 proposals, which included General Nicholson statue, which was gifted away by Government of India in 1960s to Government of Ireland, for de-notification of the monuments mainly on the grounds that these were missing or untraceable. However, these monuments had not been de-notified as of December 2012.

We also observed substantial delays at the Circle level in sending proposals for de-notification, despite being aware that monument was untraceable on ground. For example, the two 'site of siege batteries with inscription' in Qudsia Garden in Delhi

Circle were not traceable since 1971. Proposal for de-notification of these monuments was submitted only in July 2012.

In another case, the Notification issued in 2003 for the monument 'Sat Narain Bhawan' in Delhi Circle was quashed by the Delhi High Court. However, the monument was not de-notified and was still featuring in the list of protected monuments. Joint physical inspection of this monument revealed that the owners had demolished the building but the Circle office had no information on this matter. The monument, continued to be "protected" by the ASI in its records.

2.4 Information on Location and Actual Condition of Protected Monuments

During a joint physical inspection of selected monuments, we found that the ASI officials were often unaware about the exact location and actual condition/nature of the monuments they were assigned to protect as discussed below:

- Rewa sub Circle in Bhopal Circle showed a rock painting at Rewa "**fresco paintings at Gahir, Rewa**", a centrally protected monument. The Circle was not aware of the existence and exact location of this protected monument.

- In Delhi Circle, the Kashmere Gate Sub Circle could not locate the exact site of the protected monument listed as ***"Enclosure containing the graves of Lt. Edwards and others, murdered in 1857'*** during joint physical inspection with us.

- A sculpture from the protected monument '**Sculptures in the Chummery Compound, Tezpur, Assam'** was shifted to the environment park by the Tezpur Municipal Board in 1995-96. Guwahati Circle requested (1997) the DG, ASI to de-notify the monument whereas, the Municipal Corporation in 1998 requested the DG, ASI to accord permission for shifting which had not been accorded by DG, ASI till date. Guwahati Circle after inspection in July 2008 found that one school building was constructed at the protected area.

The above instances indicate that the mechanism of inspection by the ASI was grossly inadequate. Norms of regular inspection at Circle/Sub Circle level were absent, resulting in inadequate information about the location and status of protected sites.

The Ministry (May 2013) replied that probably the information was collected from ill informed field staff of the sub Circle. Such complicated matters should have been discussed with SA of the concerned Circle. The reply is not tenable as it is the field

staff of sub Circles that looks after the monuments on day to day basis. Further, SAs were informed before and after the visits by us.

2.5 Number of "Missing" Monuments

The ASI informed (2006) the Ministry that 35 of the total centrally protected monuments were not traceable. This figure was also communicated to Parliament in the same year. The same information was also communicated again in June 2012. However, the joint physical inspection of the monuments along with the officials of the ASI revealed that in the sample of 1655 (45 *per cent*) monuments selected by us, 92 monuments (6 *per cent*) (Detailed in **Annex 2.1**) were not traceable as detailed below:

Table 2.3 Details of number of missing monuments

Sl. No.	State	Number of 'missing' monuments as communicated to Parliament	Number of missing monuments as per the joint physical verification
1.	Assam	1	6
2.	Arunachal Pradesh	1	
3.	Delhi	12	15
4.	Gujarat	2	2
5.	Haryana	2	2
6.	Jammu and Kashmir	3	3
7.	Karnataka	1	4
8.	Madhya Pradesh	-	2
9.	Rajasthan	2	3
10.	Uttarakhand	3	2
11.	Uttar Pradesh	8	16
12.	Andhra Pradesh	-	8
13.	West Bengal	-	7
14.	Maharashtra	-	8
15.	Tamil Nadu	-	3
16.	Bihar	-	11
Total		35	92

We also found that one of the monuments in Dehradun Circle (Uttarakhand) **'Remains of ancient buildings locally identified with Vairatapattana, Dhikuli, Nainital'** was reported to the Parliament, as being untraceable by the DG, ASI. However, this monument was still being depicted in the records of the Circle office. The Circle office had also reportedly incurred expenditure on the maintenance of the monument during 2011-12.

Recommendation 2.2: *The ASI should make a provision for inspection of each protected monument by an officer of suitable level periodically. The ASI should publish the state of each monument being protected by it on the basis of detailed inspection note and photographic evidence collected during such inspection on a regular basis.*

The Ministry (May 2013) accepted the recommendation and stated that the number of missing monuments i.e. 35 reported to Parliament was based upon a survey done in 1998-99. We noted that the Ministry did not possess the correct and updated status on the number of missing monuments. We are unable to verify the details of Ministry's reply in the absence of any documentary evidence on record.

The Ministry also intimated that based on inspections, nine out of 35 monuments were *reported to be traced* but the final verification and confirmation was to be done. However, no documentary evidence in respect of the survey carried out viz. the inspection report along with the photographs of the present condition of the monument could be shown to us in support of this claim.

2.6 Discrepancies in Issue of Notification

2.6.1 Criteria for Issue of Notifications

A monument is declared to be of national importance only after publishing a notification in the Gazette of Government of India. However, we noted that there were no specific criteria for notifying number of monuments in one complex either as a single monument or as an independent monument. There were instances of more than one monument being notified by the ASI in a single complex as detailed below:

Table 2.4 Details of instances where more than one monument was notified in the same complex

Circle	Complex where more than one monument notified	Number of monuments notified
Delhi	Roshanara Bagh complex	2
	Qudsia Garden complex	2
Patna	Barabar & Nagarjuni hills, Jehanabad	7
	Kurisarai, Gaya	5
	Ancient structures in Rajgir, Nalanda	3
	Maner, Patna	4
	Sharqui monuments at Jaunpur	4
Dharwad	Great Durga Temple Complex, Bijapur	8
	Jyotirlinga Temple Complex, Bijapur	6
	Mallikarjuna Temple Complex, Bijapur	4
	Galagantha Group of Temples, Bijapur	6
	Kontigudi, Bijapur	2
	Huchchappayya Matha, Bijapur	2
	Trayambakesvara Temple, Bijapur	3
Dehradun	Jageshwar temple complex, Almora	6

There were also cases wherein independent structures within a complex were notified as a single monument. Afew examples of such categorisation were the Red Fort and Qutb complex in Delhi Circle, Bidar Fort, group of Bahmani tombs in Dharwad Circle and group of temples on Hemakunti hills in Bengaluru Circle.

In the absence of a uniform standard to recognise a monument as an independent entity, we could not conclude that security concerns and budgeting needs of monuments were adequately assessed and addressed.

Recommendation 2.3: *There is a need to have clearly laid down guidelines for notifying number of monuments in one complex as a single monument or as independent monument.*

The Ministry (May 2013) intimated that now the ASI was following the criteria of issuing only one notification for the entire complex rather than having separate notifications for each of the monument located therein.

We also found some cases where instead of notifying the whole structure of a monument, only certain portion of the monument was declared as centrally protected monument and the remaining part was left as unprotected. The details are as given below:

Table 2.5 Details where part of the monument was not declared protected

Circle	Name of the protected monument	Area not defined as protected monument
Delhi	City wall of Shahajahanabad, Darya ganj	Some portion of the wall across the road was left as unprotected
Dharwad	Basadis at Chandragiri Hills, Sravanabelagola	Out of 14 basadis, 11 were not declared as protected and left as unprotected
Dehradun	Jageshwar group of temples	Out of the 124 temples, 118 temples were not declared as protected
Chandigarh	63 Kos Minars	Kos minar in TaranTaran was not protected
Trissur	Rock cut cave, Vizhinjam	Extended portion of the boulder outside the boundary wall not protected
Trissur	Burial site at Kudakkallu Parambu	Unexcavated burial sites outside the protected area

The Circles concerned could not provide any documented reasons for the categorisation adopted in such cases.

The Ministry (May 2013) intimated that part of the city wall of Shahajahanabad, Darya Ganj was not declared protected as it was encroached. The miniature temples were not protected in Dehradun Circle as they were votive in nature and only the important Kos Minars were protected in Chandigarh Circle. The Ministry did not provide any documentary evidence in support of its contention.

2.6.2 Double Notifications

We noted that the ASI did not maintain any centralised inventory of protected monuments with full details of the sites and structures. Similarly, the ASI also did not have information on monuments protected by various states. Hence any new proposal for notification could not be thoroughly verified by them. Resultantly, we found that some monuments were notified by the ASI twice. E.g. Hauz Shamsi[7] at

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[7] Notified as 'Houz Shamsi with central red stone pavilion situated at Mehrauli in field No 157-81, 1586-97, 1614 & 1624' vide 7485 EDU dated 25.10.1918

Delhi was also notified as Shamsi talaab[8] and Iron Hindu Pillar[9] was also included while notifying the Qutb complex[10] .

Such instances call for comprehensive review of notifications.

The Ministry (May 2013) replied that the cases of double notifications was a result of an error committed between 1908 to 1925. It further stated that efforts would be made to rectify all such cases by the ASI on merit.

2.6.3 Monuments included in the list though not Finally Notified

As per section 4 of the AMASR Act, a monument was termed as centrally protected monument of national importance only after publication of final notification in the Gazette of India. We, however, found instances where monuments were included in the list of centrally protected monuments even though the final notification had not been issued in the Gazette of India (February 2013). The details are given in **Annex-2.2**.

The Ministry (May 2013) stated that all such issues shall be taken care of at the time of physical verification of the protected monuments.

2.6.4 Instances of Hasty Notification

During our audit we also noticed cases where sites with encroachment or unauthorised occupants were notified. In such cases, litigation followed the notification. As a result, the ASI was unable to carry out any preservation work on the sites. Some illustrative cases were as follows:

i. In 2004 the ASI notified a building as *Tamluk Rajbati* in Kolkata Circle despite objection from the owner of the place. The owner claimed that the dilapidated building was *Jhulan Dalan (Imarat)* and not *Tamluk Rajbati*. As the monument was in a dilapidated condition, the Circle had a plan to shift the *Tamluk* Site Museum in the building after restoration. Some of the owners in 2004 went to the court challenging the notification. Consequently the matter became sub-judice. Till December 2012, the ASI could not even place the protection notice board, despite passage of more than eight years after notification. No

[8] Notified as 'Shamsid Tallab together with platform entrance gates at Mehrauli' vide Punjab notification No 37 dated 15.2.1908

[9] Notification No Punjab Gazette 849 dated 9.12.1909

[10] Notification No 387 EDU dated 16.1.1914

restoration work had been carried out by the Circle office pending the outcome of the case.

ii. The ASI notified two monuments in Kolkata Circle viz 'Clive's House Dum Dum known as Barakothi' in March 2004 and 'Moti Jheel masjid' in June 2011. Clive house was occupied by 22 families, while Moti Jheel Masjid was occupied by an Islamic school (*Madarsa*) and some families. We noted that both these monuments were occupied before their notification as protected monument. As a result, the ASI was unable to take action against the occupants as encroachers of the monument. Further, the ASI was also unable to carry out any preservation and conservation activities on these monuments.

In such situations, notification of sites did not carry any meaning.

***Recommendation 2.4:** The ASI should have a laid down policy for notification of sites with contested ownership or occupants. These sites can be placed in the tentative list for nomination till all disputes are resolved.*

The Ministry (May 2013) stated that such actions had been taken on the assurance given by the occupants and also the State Governments. However, the ASI had now taken a stand that a monument or site shall be notified as protected preferably when it is free from all encumbrances including the ownership rights.

2.6.5 Monuments protected by both Centre and State

We also found cases where one monument was notified and protected by both the ASI and the State government e.g. ***Fort in ruins Dharanikota at Gumtur and Bhimeswara temple at Samalkot, East Godavari District.*** They were notified by the ASI, Hyderabad Circle and State Department of Archaeology and Museums, Andhra Pradesh. The ASI had notified these monuments in 1967 and 1964 respectively. The ASI stated (September 2012) that the State Department of Archaeology and Museums would be requested to delete these monuments from the state list.

Similarly a part (lion statue), of the ASI protected monument 'Stone group of a gigantic lion standing on a small elephant' of Patna Circle in Jaunpur, was also included in the protected list of State Archaeology Department, Uttar Pradesh.

These cases indicate gaps in the notification process, coordination with State Archaeology Department and incomplete documentation at the time of notification.

2.6.6 Repeated Notification and De-notification

Some cases were noticed where sites were notified, de-notified and re-notified without any recorded reasons. E.g. Five monuments commemorating Anglo-Sikh battles fought in the 19th century at Mudki, Subraon, Saragarhi, Ferozeshah and Misriwala in Ferozepur, Punjab were earlier in the list of protected monuments of national importance declared in November 1918. Subsequently they were de-protected by the ASI vide No.818 dated 13 April 1927 and No.1693 dated 22 May 1962 for reasons not available on record. However in 2006, the ASI identified these five monuments once again for central protection but took no further action. Currently (December 2012), these monuments were still being protected by the State Government and were found to be in a dilapidated condition.

2.6.7 Monument Protected before completion of 100 years

As per the AMASR Act 1958 "Ancient Monument" is any structure, erection or monument, or any tumulus or place of internment, or any cave, rock-sculpture, inscription or monolith which is of historical, archaeological or artistic interest and which has been in existence for not less than 100 years.

We found cases of some monuments declared protected by the ASI which did not fulfill the criteria of completing 100 years at the time of notification. E.g.***'Cooch Behar Palace' in Kolkata Circle*** was notified in 1982 before completing 100 years. The Kolkata Circle intimated that this was a special case. We could not appreciate this argument as no such exemption was available in the Act. A similar case was noticed in the Delhi Circle where a monument called ***'Sat Narain Bhawan'*** was notified in 2003. However, when the owners contested the claim, ASI could not prove in the court that the building was more than 100 years old. The court quashed the notification in 2007. The monument was still pending de-notification.

2.6.8 Antiquities protected as Monuments

As per the AMASR Act, 1958 the definition of monument was as given below:

"Ancient monument" means any structure, erection or monument, or any tumulus or place of internment, or any cave, rock, sculpture, inscription or monolith, which was of historical, archaeological or artistic interest and which had been in existence for not less than one hundred years, and included-

(i) the remains of an ancient monument,

(ii) the site of an ancient monument,

(iii) such portion of land adjoining the site of an ancient monument as may be required for fencing or covering in or otherwise preserving such monument, and

(iv) the means of access to and convenient inspection of an ancient monument";

We observed that the ASI was protecting a number of 'monuments' which did not constitute a monument as per the Act. A few examples are canons, guns, jhoolas, statues etc. which were being protected by the ASI as centrally protected monuments of national importance. No specific reasons were accorded as to why these were protected as monuments and not as antiquities. A list of such monuments is placed at **Annex 2.3**.

2.7 Categorisation of the Monuments

As per Section 4A of the AMASR (Amendment & Validation) Act 2010, the Central Government shall, on the recommendation of the Authority, prescribed categories in respect of ancient monuments or archaeological sites and remains declared as of national importance. The Central Government shall, on the recommendation of the National Monument Authority (NMA), classify all the ancient monuments or archaeological sites and remains declared as of national importance in accordance with the categories prescribed under sub section (1) and thereafter make the same available to the public and exhibit on its website and also in such other matter as it may deem fit.

The ASI Headquarter notified in 2011 that all the monuments were to be categorised in following manner:

Table 2.6 Details of different categories of monuments

Category I	World Heritage Sites
Category II	Tentative list of World Heritage Sites
Category III	Identified for inclusion in the World Heritage tentative list
Category IV	Ticketed monuments (other than mentioned above)
Category V	Identified for categorisation as ticketed monuments
Category VI	Living monuments which receive large number of visitors/pilgrims
Category VII	Other monuments located in the Urban/semi urban limits and in the remote villages
Category VIII	Other category as the Authority may deem fit

We noted that the categorisation was being followed only by the Guwahati Circle. No other Circle had carried out this categorisation so far. No detailed guidelines or any timelines were prescribed for the completion of this activity.

Further, we also noted that no record was maintained on the number of visitors as required for Category VI. There was no guidance how this information was to be collected for the purpose of categorisation.

The Ministry stated (May 2013) that the categorisation of the protected Monuments/Sites was the responsibility of the NMA and not that of the ASI. The fact remains that the Monuments/Sites were not categorised and no timelines were fixed for the same. Moreover the ASI being the custodians of the protected monuments should only propose categories for each protected monument /Sites for NMA's approval.

2.8 Access to the Protected Monuments

2.8.1 Unauthorised Activities at the monuments

According to Para 26 of the John Marshall's Manual of Conservation, the Living monuments were those structures that were still in use for the purpose for which they were originally designed at the time of notification of the monument. This implied that any activity, such as worship, which was subsequently introduced in a monument, but was not being carried out at the time of notification, would be deemed as unauthorised.

We found that in many monuments such unauthorised activities were being carried out. The ASI replied (May 2012) that presently 955 monuments were being used for worship and prayers. However, the ASI did not have the details of monuments where prayers/worships were being held prior to issue of notification. During Joint Physical inspection, we found that in many monuments electrical points, loudspeakers, fans, etc. were also installed by unauthorised persons to facilitate these activities. Some examples were Ancient Mosque, Palam and The Mosque, Qudsia Garden in Delhi Circle.

The ASI, thus, failed to protect the monuments of national importance by not restricting the unauthorised activities being held there.

2.8.2 Closure of Monuments or its part without the Approval of DG, ASI

As per the extant rules[11], DG, ASI may direct that a protected monument or any specified part thereof shall not be open, permanently or for a specified period to general public.

Joint physical inspection of monuments revealed that in eight Circles, parts of the 23 monuments were closed for visitors without the approval of the DG, ASI as detailed in **Annex 2.4**. There was neither any reporting requirement for such closures nor any mechanism to ensure that closure of parts of the monuments was approved in advance by the competent authority.

Delhi Circle could not provide any information on monuments or its parts closed as per the approval of DG, ASI. Circle intimated that some parts were closed due to security reasons. No security threats were however, found recorded or intimated to ASI HQ or the Ministry.

The Ministry (May 2013) stated that the ASI would examine all such cases and would take remedial measures wherever necessary.

2.8.3 Restricted access to the monuments

Section 18 of AMASR Act 1958 provided a right of access to any protected monument to all visitors. However, it was noticed that there were many monuments access to which was not open for all visitors. Some of the protected monuments were situated in the premises of other organisations and were not in the control of the ASI as listed below:

Table 2.7 Monuments in the premises of other agencies

Sl. No.	Circle	Monument	Area under which the monument exist
1.	**Delhi**	Unknown tomb	Jawahar Lal Nehru Stadium
2.		Shikargah Kushak II -327	Nehru Planetarium
3.		Lal Bangla	Delhi Golf Course
4.		Kos Minar or Mughal Mile Stone	Delhi Zoo
5.		Gazuddin Tomb	Anglo Arabic School
6.	**Patna**	Buddhist site up to limit of Narokhsar Tank near Dhamesh Stupa, Sarnath	Forest Department, Uttar Pradesh
7.		Lt Col Pogsons' Tomb, Varanasi	Cantonment Area, Military Wing

[11] As per Rule 4 of the AMASR Rules 1959

The ASI did not enter into any agreement/MoU with the management of these organisations for allowing visitors to these centrally protected monuments. Thus, practically these monuments were not open to general public, which was a violation to the Act.

The Ministry (May 2013) replied that the ASI would pursue the matter of individual written agreement with owners wherever feasible.

It was also noticed that at some centrally protected monuments, there were restrictions for people of some category/religion to enter into the monument. Some of the illustrative examples are as follows:

Table 2.8 Monuments where entry to visitors was restricted

Sl. No.	Circle	Monument	Reasons
1.	Lucknow	Sikandar Bagh Building	Non Muslims were not allowed
2.		Tahsin Ali Mosque	
3.		Dargah Hazrat Abbas	
4.		Tomb of Ghaziuddin Haider	
5.		Imambara Aminud-daula	
6.		Jama Mosque near Hussainabad, Lucknow	
7.		Masjid connect with Asaf-ud-daula, Lucknow	
8.	Hyderabad	Khulla Mulla Mosque	
9.		Thumamala Mosque	
10.	Dharwad	Asar Mahal	Women were not allowed
11.		Makka Masjid, Bijapur	Men were not allowed

Recommendation 2.5: T*here is an urgent need to come up with a written agreement with the management of the sites with restrictive entry, to enable access to these sites by common visitors. The ASI also needs to develop policy for maintaining such sites.*

The Ministry (May 2013) stated that these restrictions had to be imposed because of the age-long tradition and the ASI does not interfere with religious functions.

2.8.4 Use of Monuments for other Purposes by the ASI

No person shall, within a protected monument do any act which causes or is likely to cause damage or injury to any part of the monument. The AMASR (Amendment & Validation) Act 2010 also prohibited construction within 100 meters of the protected monument. However, we noted that the ASI itself was not complying with the provisions of the Act.

The Circle offices and the Sub Circle offices of the ASI were located in the centrally protected monuments. The divisional and zonal offices of Science Branch and divisions of Horticulture Branch were also situated in the protected monuments. They carried out changes to the structure of the monument viz fitting air conditioners, electrical fittings, water pipes etc. Toilets were laid with ceramic tiles in the monuments for these offices. These changes were not consistent with the original character of these monuments. We also observed that offices of the Institute of Archaeology, National Mission on Monuments and Antiquities, Commandant of CISF, Zonal office of Chemical Branch and Office of Horticultural Branch and their stores were located inside the Red Fort, Delhi which is a World Heritage site.

Some of the World Heritage Sites (Red Fort, Delhi and Fatehpur Sikri, Agra) had VIP/guest rooms equipped with modern facilities. Sensor fitted taps, hand drier, etc. were installed which were not in consonance with the aesthetic values of the monuments.

The Ministry (May 2013) accepted the observation and stated that sometimes it becomes difficult to completely follow the principle considering the interest of the monument.

We also noted that complexes as such as the Red Fort, Delhi included the residence of the DG, ASI, SA and Dy. SA of Delhi Circle and the Conservation Assistant (CA) of the concerned monuments. In addition, security guards of the private security firm hired by the ASI were also residing in monuments such as the Red Fort, Delhi and Purana Qila, Delhi.

The Ministry (May 2013) intimated that residences of the ASI officials and accommodation of the security guards were in the modern barracks and not in the protected monument. The reply is not tenable as the ASI was incurring expenditure for the entire complex as a protected monument.

Recommendation 2.6: *It is inevitable that changes would be carried out in the protected monuments if they are to be also used as offices and residences. For these exceptions, the ASI should prepare detailed guidelines and get the Act revised appropriately.*

The Ministry (May 2013) accepted the recommendation and intimated that guidelines to the Circles in this regard would be issued for strict compliance.

2.8.5 Cultural Events at the Monuments

In terms of Rule 7 of the AMASR Rules 1959, no protected monument shall be used for the purpose of holding any meeting, reception, party, conference or entertainment except under and in accordance with permission in writing granted by the Central Government. DG, ASI in 2005, approved a list of 120 monuments in which cultural events/programs could be organised at prescribed fees ranging from ₹ 25000/- to ₹ 50000/- per day and a refundable security deposit of ₹ 50000/. However this permission was subject to certain conditions such as:

The organisers

- will not sell tickets for the event
- will not carry out commercial activities during the event
- will not cause any damage to the monument.

A penalty could be imposed by the ASI in case of any damage to the monument or the violation of the guidelines in this regard. The ASI earned revenue amounting to ₹ 1.39 crore by organising cultural events in the centrally protected monuments. However, we noted that in a number of cases the stipulated conditions were not complied with.

- There were monuments where festivals were organised without the approval of the Central Government e.g, the Dushehra festival in the Ruined Fort of ***Nurpur in Shimla Circle***. This was allowed without the approval of the DG, ASI. The ASI did not receive any fees from the organisers of the festival.

- In 2011 a cultural function was organised at ***Khusroobagh (Allahabad) in Lucknow Circle without the approval of DG, ASI.*** This monument did not form part of the list of 120 monuments notified by the DG, ASI where cultural events could be held.

- Similarly, in the ***Red Fort in Delhi Circle,*** *Ramlila* was being organised every year. Delhi Circle office did not charge any fees from the organisers on the grounds that it was a religious function. We did not find any documented instruction or waiver specified in the guidelines issued by DG, ASI for a religious function. It was also observed that the organisers were carrying out commercial activities in violation of the provision of the Act.

Evidently, the ASI failed to effectively implement the conditions required for organising the cultural events in the centrally protected monuments.

The Ministry (May 2013) intimated that the religious functions were allowed as per customary practices. The reply is not tenable as the rules do not permit for waiver of prescribed fees for religious functions.

2.9 Inspection of the Monuments

According to Conservation Manual of John Marshall, regular and systematic inspections of monuments were to be carried out annually or even more frequently.

The ASI has had a long tradition of inspection by senior officials of the ASI, including the Directors General. In the archives of the ASI, detailed inspection notes, written by the inspecting officers were available. These notes highlighted the conservation and preservation requirements and also documented the state of a monument/site on a given date. We found that the practice of inspection had been completely given up in recent years. There were no inspection notes available on records detailing the inspections done by the DG, ADG and Director (Conservation) and other officers during the period covered under Audit. Similarly at the Circle level there were no inspection notes available on the visits of Superintending Archaeologist (SA), Deputy Superintending Archaeologist (Dy. SA). The inspection notes by Sub Circle in-charge and sometimes by the SA were available on record only in relation to proposals of detailed estimates of conservation works.

The ASI replied (August 2012) that there was no set mechanism/system for inspection of monuments by ASI HQ.

In the absence of inspection records, it was not possible for us to ascertain the date on which a particular site was last visited. In the context of monuments becoming untraceable and being encroached upon, this documentation was of utmost importance.

Recommendation 2.7: *The ASI should prescribe detailed guidelines for inspection of monuments in a regular manner. There should be a written policy for submission of inspection notes after each inspection was carried out by any officer.*

The Ministry (May 2013) stated that guidelines on inspection of monuments already existed so as to ensure that these were inspected on regular basis. The sub circle in-charge should visit once in a month whereas SA should visit once in a year. The reply is not tenable as no such specific records of inspections were found during audit in any Circle of the ASI.

2.10 Maintenance of the Information in respect of Monuments

2.10.1 Compilation of Data related to Notifications

Each monument of national importance was to be notified by the ASI in the official gazette. Thus each centrally protected monument was assigned a unique notification number. The notification provided legal authority for the ASI's intervention at the site. It was found that the ASI did not maintain the records regarding the notification, number and date of notification of centrally protected monuments at its headquarters.

The ASI stated (July 2012) that the list of monuments with date/ number of notification was not being maintained and hence was not available. After gathering the information from the Circle offices, DG, ASI provided the list of 10 Circles in July 2012 and further five Circles in August 2012. The information in respect of the remaining nine Circles could not be collected till completion of Audit (December 2012). This demonstrated the lack of Management Information Systems (MIS) at the DG, ASI's level and also the dismal state of documentation in the organisation.

Audit of the Circle offices revealed that the information in respect of the notifications was not fully available at the Circle level, as detailed below:

Table 2.9 Monuments in respect of which information was not available at Circle offices

Sl. No.	Name of Circle	Number of monuments	Number of monuments for which details are available
1.	Dharwad	299	110
2.	Ranchi	12	10
3.	Dehradun	42	41
4.	Guwahati	69	59
5.	Hyderabad	137	115
6.	Shimla	40	0
7.	Goa	21	5

Recommendation 2.8: *The notification is an important document which not only provides a legal status for centrally protected monument but also defines the area of the site. This document is crucial for establishing encroachment or unauthorised construction at the site. The ASI should maintain a centralised database of all notifications and records related to the sites which should be readily available with the ASI HQ.*

The Ministry (May 2013) accepted the fact that ASI did not have Management Information System (MIS). They intimated that a fresh initiative has been taken by the Circles to collect the photo-copies of the original notifications in respect of protected monuments under their jurisdiction and compile them in a book form.

2.10.2 Discrepancies in the Information on the Monuments

It was noticed that the Indira Gandhi National Centre for Arts (IGNCA), an autonomous organisation of the Ministry of Culture, was running a project named '*Kala Sampada*'. Under this project, digitised documentation of the monuments and archaeological sites was being collected and maintained on their website. Scrutiny of records revealed that the information provided by IGNCA on their website did not match with the information provided by the Circle office in respect of their monuments. For instance in the following cases, discrepancies were noticed in the information provided by the IGNCA and the ASI for the same monuments:

Table 2.10 Details of discrepancies in the geographical location

Sl. No.	Monument	State	ASI-Latitude	ASI-Longitude	IGNCA-Latitude	IGNCA-Longitude	Effects to be on present monument location[12]
1.	Gunavati group of temples	Tripura	23.31 N	91.09 E	23.32 N	91.30 E	1.85 km more north & 38.85 km more east
2.	Ranganathdol	Assam	26.58 N	94.41 E	26.58 N	94.37 E	7.40 km less east
3.	Sivadol	Assam	26.56 N	94.34 E	26.57 N	94.32 E	1.85 km more north & 3.70 km less east
4.	The Mound & ruins of the stone temple-Dah Parbatia	Assam	26.37 N	92.47 E	26.38 N	92.45 E	1.85 km more north & 3.70 km less east

Thus, two organisations under the same Ministry maintained different set of coordinates for the monuments. There was no coordination and reconciliation of information between the two organisations before placing it in public domain.

Similar cases of discrepancies were noticed in the Ranchi Circle, where the area defined in the notifications was different from that ofprovided by the Circle office:

[12] One degree of latitude/longitude = 111 kilometres, 1 second = 111/60 = 1.85 km; N=North & E=East, Lat=Latitudes & Long=Longitudes; e.g. 91.30 E - 91.09 E = 21 seconds, 38.85 km = 21x1.85km

Table 2.11 Details of discrepancies in the areas defined in the notification

Sl. No.	Name of the monument/site	Area as per Notification	Area as per ASI Circle	Difference in acres
1.	Benisagar tank and remains of temple and sculpture in survey plot No 322	76.73	49.02	(-) 27.71
2.	Asura site and ancient stone temple with shiva lingam	0.015	3.97	(+) 3.81
3.	Baradari building with probable underground cell	0.03	3.84	(+) 3.61
4.	Asura site, Kunti	49.76	49.79	(+) 0.03

***Recommendation 2.9**: There should be no room for ambiguity and difference in factual information related to the monuments. The ASI should collect the MIS data from its Circles on each of the protected monument and place it in public domain after reconciling the discrepancies.*

The Ministry (May 2013) accepted the recommendation and intimated that efforts would be made to eliminate ambiguities.

2.10.3 Inventory of the Monuments

The ASI is required to maintain[13] an updated inventory comprising the brief details of all the protected monuments. The inventory should have details about the monument such as notification number, site plan, brief history and the photographs. These inventories were to be updated from time to time so as to provide the latest and correct information.

It was noticed that out of the 24 Circles, only Aurangabad Circle was maintaining and updating the inventory of the monuments properly.

The ASI commenced (1997) a project to edit and publish the inventories of all Circles. After four years of the project, inventories of only five Circles were published. The project was wound up abruptly. Further, the published inventories were not updated. This led to non-availability of accurate data relating to inventories as tabulated below:

Table 2.12 Details of non updation of inventory

Sl. No.	Name of the Circle	Monuments as per current list of ASI	Monuments as per published inventory
1.	Delhi	174	154
2.	Chandigarh	123	118
3.	Jaipur	163	156

[13] As per note under Para 11.3.1 of A.W. Code

Further, Circle office level inventory details were not prepared properly nor updated regularly. For example, Kolkata Circle was maintaining the inventory of 129 monuments only out of the existing 136 monuments. Chennai Circle was able to produce inventory of 351 monuments out of the total of 411. Out of the 351 produced to Audit, 215 were not certified by the Circle in-charge. Guwahati Circle inventory lists did not include details of four centrally protected monuments.

Inventory of the Dharwad and Bengaluru Circle, prepared in 2000 and 1992 respectively, were not submitted to the ASI HQ.

Recommendation 2.10: *In our opinion, publishing the inventory of monuments should be completed in a time bound manner.*

The Ministry while accepting the audit comment (May 2013) intimated that a few of the inventories were almost ready for being published since 2006-07 but no further action to publish them could be taken owing to acute shortage of staff.

2.10.4 Joint inspection with Revenue Department

The Circle offices were required to carry out a joint physical inspection with the revenue department of the state government to ascertain the exact area of the notified monument. We noted that out of the 3678 protected monuments with the ASI, the joint survey was carried out in only 409 monuments. There was no time-frame to complete this work, nor was there any reporting by Circles or periodic monitoring of progress by the ASI HQ in this regard.

2.11 National Mission on Monuments and Antiquities

The archaeological sites and remains were managed both by Union and State Governments. However, there were thousands of monuments and sites which were unprotected, and were in a state of neglect. As per records, there were about five lakh unprotected monuments and about 70 lakh antiquities available in India at different places. Most of them were not even registered in the absence of any registering body.

For the documentation and creation of a suitable database on built heritage and sites and antiquarian remains, the Prime Minister in August 2003 announced the setting up of a National Mission to prepare a national data base on India’s tangible heritage.

The National Mission on Monuments and Antiquities (NMMA) was formally launched after much delay in 2007 with tenure of five years in the ASI.

2.11.1 Performance of the Mission

As per the Expenditure Finance Committee (EFC) memo, the Mission was to document the five lakh unprotected monuments and about 70 lakh antiquities by 2010. However till 2012, NMMA was able to complete the documentation of only 80000 Monuments and eight lakh antiquities. Out of these eight lakh antiquities, three lakh were already registered with the ASI. NMMA was able to upload only 2823 entries on the website out of the 8.80 lakh entries.

We noted that ₹ 34.03 crore out of the approved budget of ₹ 90 crore was released by the Ministry. Further, out of this sum only ₹ 14.12 crore (16 *per cent*) had been utilised by the NMMA indicating substantial under-utilisation of funds.

NMMA was first established at Tilak Marg, New Delhi after incurring an expenditure of ₹ 53.28 lakh. However, in February 2010 NMMA was shifted to Red Fort. During the process of shifting NMMA lost valuable data. Further, for dismantling and reinstalling etc. at Red Fort NMMA had to incur an expenditure of ₹ 30.52 lakh.

2.11.2 Secondary Sources for Documentation

The mission document of NMMA originally included a proposal for primary survey to collect information on the monuments with a budgetary requirement of ₹ 400.00 crores. In 2004, citing time and budgetary constraints, DG,ASI decided that data should be collected from secondary sources such as exploration /excavation reports, memoirs, catalogues, project works and other published references with a budget provision of ₹ 90.00 crore. Thus, the Mission adopted data without any independent verification.

We noted that the data obtained through secondary sources was sketchy, not fully reliable or authentic. We also found on record that experts in various workshops and meetings recommended for a primary survey to be undertaken to build a credible national level data base on built heritage, sites and antiquities. Finally in June 2010, after investing three years of effort in collecting data through secondary sources, NMMA requested permission of the ASI to conduct a primary survey. However no decision had been taken to commence this work (November 2012).

We noticed that the Ministry was also aware of the lack of credibility of the data collected so far. In December 2011, it instructed NMMA to indicate, while uploading on website, that the data was subject to validation. The Mission attempted to validate the data through experts; however, by then, the tenure of NMMA expired in 2012. Hence the mission failed to achieve its objective within the prescribed time. It had now submitted extension proposals for completing the work during the next five years i.e. till 2017 at a cost of ₹ 99.00 crore.

2.11.3 Monitoring of the Mission

There were only four meetings of the Monitoring committee and five of the Finance Committee since 2007.

Out of the 33 State level Implementation Committee (SLIC), no committee was formed in seven states/UTs[14]. Further, in 26 States, where the SLIC were formed, no meeting was convened in five States[15].

For a suitable monitoring mechanism, a MIS for monitoring the performance of various activities of the Mission at different levels was to be put in place. The Mission was also required to monitor the SLICs. We, however, noted that the MIS had not been introduced till the end of Audit. Thus we found that the monitoring of the Ministry was inadequate.

The setting up, functioning and performance of the National Mission for Monuments and Antiquities were marked by lack of planning and delays. The ASI, unable to accomplish basic documentation of even its protected monuments, could not provide any impetus to this Mission.

2.12 Heritage Bye-laws

As per the AMASR (Amendment & Validation) Act 2010, the Central Government was required to prepare heritage bye-laws in respect of each protected monument and protected area. The heritage bye-laws shall also include use of building material, façade, roofing pattern, colour, height, built-up area, usage, stilt parking, underground construction, drainage systems, roads and service infrastructure like electric poles, water, sewerage, excavations and such other factors which may be necessary within the prohibited areas and regulated areas of the protected monuments and protected areas. These bye-laws were to be submitted to the National Monument Authority (NMA) for their approval and the Competent Authority was required to make them available in public domain through their website.

AMASR (Framing of Heritage Bye-laws and other functions of the Competent Authority) Rules 2011 clearly stated that the Competent Authority shall formulate ***time bound programme*** for preparation of heritage bye-laws for prohibited area or regulated area of each protected monument and protected area.

[14] Chhattisgarh, Jharkhand, Sikkim, Nagaland, Pondicherry, Lakshdweep and Daman & Diu
[15] Delhi, Goa, Manipur, Mizoram and Tripura

NMA was required to intimate, to the Competent Authority, the impact of any construction/renovation (in regulated/prohibited area) having regard to the heritage bye-laws relating to the concerned protected monuments or protected area. Provided that, the Competent Authority may, in exceptional cases, with the approval of the NMA, grant permission to the applicant until the heritage bye-laws have been prepared.

Heritage bye-laws for only two monuments had been prepared out of the 3678 centrally protected monuments. These draft bye-laws were not yet approved. There was no timeline fixed for preparation and approval of heritage bye-laws (June 2013).

As a result, all applications for NOCs for construction/renovation in such areas were treated as ***exceptional*** leaving scope for error in judgment in every case.

Recommendation 2.11: *The Ministry should come up with a strategy to ensure time bound completion of heritage by-laws for all protected monuments and their speedy approval.*

In the Exit Conference (June 2013) the ASI informed that the work for preparation of templates of bye laws had been taken up for selected monuments.

CHAPTER – III

Management of World Heritage Sites

The General Conference of the UNESCO in 1972 adopted a Convention concerning Protection of World Cultural and Natural Heritage. The Convention sought to encourage the identification, protection and preservation of cultural and natural heritage around the world considered to be of outstanding value to humanity. India ratified this Convention in November 1977.

The ASI functions as a nodal agency for nomination of World Heritage Sites (WHS) to the UNESCO. The ASI also has 19 Cultural World Heritage Sites under its administrative control.

The WHS can be a natural, cultural or a mixed site. A total of 29 sites in India had been approved as WHS till February 2013. Out of these, 19 sites (all cultural) are currently under the administrative control of the ASI. Two are with the Ministry of Railways, one with the State Government of Rajasthan, six with the Ministry of Environment and Forest and one with a temple Management committee Bodhgaya in Bihar.

3.1 World Heritage Sites (WHS)

The UNESCO Convention of 1972 was developed with the following objectives regarding world heritage sites -

- To define World Heritage in both cultural and natural aspects,
- To enlist Sites and Monuments from the member countries which were of exceptional interest and universal value the protection of which was the concern of all mankind; and
- To promote cooperation among all nations and people to contribute for the protection of these universal treasures intact for future generation.

World Heritage Sites are designated by UNESCO and procedures followed are as laid out in the Operational Guidelines of UNESCO prepared for this purpose. Even after nomination, for each site there is a provision for periodic monitoring and assessment by UNESCO.

It is prestigious for a country to have a site listed on the World Heritage list. This citation gives boost to tourism and helps local economies to prosper. The recorded sites on the World Heritage list now stands at 962, which includes 745 cultural properties, 188 natural properties and 29 mixed properties. Despite active

participation in this area, so far, India has only 29 sites (details are in **Annex 3.1**) included on the WHS list. Countries like Italy (47), Spain (44) and China (43) had comparatively higher number of sites.

3.1.1 Procedure for inscription of a Site as a WHS

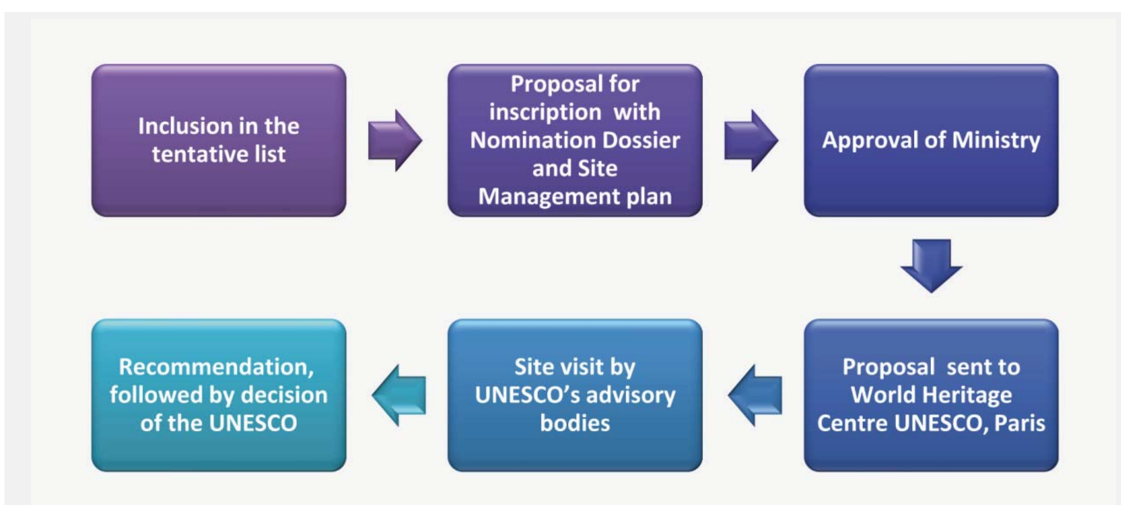


Chart 3.1 Procedure for inscription of a site as a WHS

- A site is first taken into a tentative list of UNESCO which is being maintained by the ASI in India. The sites that remain in the tentative list for a period of one year or more may be forwarded for final nomination.
- For the final nomination, a proposal is sent with nomination dossiers containing details of the site and its conservation plan. Since 2008, Site Management Plan (SMP) was mandatory for the nomination dossier.
- After approval from the Ministry, the dossier is sent to the World Heritage Centre (WHC), UNESCO Paris for further evaluation and approval.
- This is followed by a site visit by UNESCO's advisory bodies viz. International Council of Monuments and Sites (ICOMOS) or International Union for Conservation of Nature (IUCN)[16], for evaluation.
- Based on this site visit a recommendation for "rejection", "deferral" (deferred), "referral" (requirement of additional information) or inscription is given. Then, UNESCO gives the final verdict. The property is inscribed in the list, if the World Heritage Centre is satisfied about the criteria and justification of the Outstanding Universal value (OUV) given in the nomination dossier.

[16] For Natural sites

3.2 Nodal Agency for World Heritage Sites

The ASI informed us that the Ministry was the nodal Ministry and the ASI was the nodal agency on behalf of the Government of India for all World Heritage related matters**.** We found that there were no written orders to this effect available with the ASI. In the absence of these basic orders, we were unable to derive full assurance regarding the ASI's assigned role and performance. Our understanding of the ASI's role was in accordance with practices as found in the records.

3.2.1 Declining Performance of the ASI

Till now, (2012), the Government of India had submitted 53 proposals to the UNESCO. Of these, 19 ASI protected monuments are inscribed. Till 1993, the ASI had 16 inscribed WHS with reference to its own monuments. All 16 dossiers for these monuments were prepared in house by the ASI. Subsequently, this work was mostly outsourced to external consultants. With the increased use of consultants, we also noticed a steady decline in acceptance of proposals. We observed that during the last five years (2007-12), the ASI had submitted only three proposals, none of which was accepted. Out of these, two were outsourced to consultants at a cost of ₹ 79.84 lakh.

We noted that an Advisory Committee on World Heritage Matters was constituted (November 2011) in the Ministry for rendering advice and to bring about improvement in the matters relating to inscription of World Heritage Sites. The Committee had met seven times since its inception. However, there was no addition to the World Heritage list till November 2012.

The Ministry replied (May 2013) that the Advisory Committee had defended and upgraded the previous nominations of Western Ghats and Hill Forts of Rajasthan. The Ministry also stated that there were factual errors in ICOMOS evaluation for Hill Fort Rajasthan which were later accepted by ICOMOS in the World Heritage session. However, no documentary proof was provided for this and the fact remained that no new site was added to the World Heritage Site list.

3.2.2 Criteria for Selection of Sites for Tentative List

A tentative list is an inventory of those properties which each State Party intended to consider for nomination. It was a mandatory requirement before a site was finally considered for nomination. In 2011-12 India had 34 sites on the UNESCO Tentative List (Details in **Annex 3.2)** out of which 14 monuments are protected by the ASI. Proposals for tentative list forwarded by State Government, NGO and trusts, etc. were processed by the ASI as per advice of the Advisory Committee on World Heritage Matters. After filling the requisite format for tentative list it was sent to the Ministry for approval and thereafter to Permanent Representative of India (PRI), UNESCO who then submitted it to WHC for further evaluation and approval.

There were no defined criteria for selection of a monument/site for the tentative list**.** There was no standard procedure for follow up of each tentative site or prioritisation amongst the tentatively listed sites for final nomination.

3.2.3 Non revision of Tentative List

As per UNESCO guidelines it was envisaged that the tentative list were to be reviewed and updated every 10 years.

As per the records of the ASI, attempts had been made to revise the tentative listing in 2002, 2004 and 2009-10. But the ASI failed to update the list despite receiving inputs from various stakeholders. Even now, workshops were being held for revision of tentative lists, but no time frame had been fixed for completion of this exercise. In the absence of regular revision, we noticed inconsistencies and overlaps in the tentative list. For example, 'Golconda Fort of Hyderabad' appeared twice in the tentative list. Similarly nomination dossier for 'Sri Harminder Sahib, Amritsar' was withdrawn, however, it still features in the tentative list.

The Ministry stated (May 2013) that the revision of Tentative List of India is underway since 2012.

3.3 Preparation for Final Inscription

From the tentative list, nomination dossiers were prepared. The nomination document was the primary basis on which the committee considered the inscription of the properties on the World Heritage List. We observed that -

- The ASI had not defined any specific criteria for the selection of sites to be nominated from the tentative list. There were proposals in the tentative list from 1998 onwards but sites were being picked up randomly for preparation of dossiers for final nomination. Some nominations were picked from the tentative lists, while others, such as Jantar Mantar were picked up for final nomination without being on the tentative list.

- After the site was selected, a nomination dossier was prepared. There were no guidelines for development of the sites selected in the tentative list to prepare them for final nomination. In the ASI, we found that the activities constituting preparation for final inscription included only selection of consultants for nomination dossiers and Site Management plans. There was no project or concerted effort to develop the site *per se*.

***Recommendation 3.1:** The ASI should define objective criteria and requirements for selection of site for the tentative list and from the tentative list for final inscription of World Heritage Site, as this will help in prioritising, planning and preparing the sites before nomination.*

***Recommendation 3.2:** The ASI should adopt a systematic approach for the development of tentative world heritage sites through conservation and site management. This alone can ensure final inscription of the site.*

The Ministry stated (May 2013) that ACWHM was in the process of updating the tentative list and was also ensuring that management systems were in place before the dossiers were sent to WHC. Besides, the ASI was trying its best to maintain the prospective World Heritage Site in a good state of conservation. The reply is not correct as the ASI did not distinguish and categorise any monument as prospective World Heritage Site at any stage of its planning or execution of works.

3.3.1 Selection of Consultants for Nomination Dossiers

We noticed that external consultants were appointed by the ASI for preparation of nomination dossiers of WHS and also for Site Management Plans. The selection process differed from case to case. In some cases, the ASI appointed the consultants and in others, the States did so. Our scrutiny revealed lack of transparency, tendering irregularities and undue favours to consultants. In all the five[17] cases proposed by the ASI, the sites had not been enlisted on the World Heritage List till December 2012 despite several attempts and contractual liability of ₹ 1.76 crore[18] towards the consultancies[19] as detailed below:

Santiniketan, West Bengal (2009) :

Work for Nomination Dossier - In May 2009, work was assigned jointly to Ms Abha Narain Lambah and Shri Manish Chakravorty at a cost of ₹ 35 lakh.

Status of Proposal: Nomination submitted in January 2010 was withdrawn after assessment of ICOMOS and not taken up for resubmission.

Irregularities noticed in Audit :

- Site was picked up randomly.
- Instead of open tendering, limited quotes were called from eight consultants. No criteria were on record for this short listing.
- Despite being incomplete, the bid given by one of the bidder was not rejected and declared as L1.
- Work was awarded jointly to L1 and L4 bidders in violation to CVC guidelines.

[17] Santiniketan, Majuli, Serial Nomination of Harappan sites, Extension to Pattadakal and Rani ki Vav.
[18] Out of which payment of ₹ 1.05 crore had been released.
[19] The nomination dossier of Rani ki Vav was prepared in house

Majuli, Assam (2004, 2008, 2012)

Work for Nomination Dossier:

1. In 2004, Ms Nalini Thakur and Shri Surojit Jaradhara were assigned the work.
2. In 2008, Ms. Poonam Thakur and Shri Rohit Jigyasu were assigned the work at a cost of ₹ 16.84 lakhs.
3. In 2012, Shri Suryanarayan Murthy (M/s Kshetra) was assigned the work involving payment of ₹ 28 lakhs.

Status of Proposal:

The three proposals were respectively referred for additional information, deferred and found technically incomplete by ICOMOS. The site could not get the inscription till now.

Irregularities noticed in Audit:

- The site was the largest river island of the world, yet it was presented as a Cultural site and not a Mixed or Natural site.
- The ASI experimented with three different consultants. However, the work was not satisfactorily carried out by any of them.
- In one of the three cases, the dossier was evaluated and approved by ACWHM, however, found technically incomplete. This shows the improper vetting by ACWHM.
- In all the three cases the consultants who had prepared the dossier, were not held responsible for rejection of the dossiers, being incomplete.

Serial nomination on Harappan Sites (2008)

Work for Nomination Dossier:

Shri Ranesh Ray was assigned this work at a cost of ₹ 65 Lakhs in March 2009

Status of proposal:

Proposal was deferred by the ASI for 2010 even before completion of Dossier.

Audit observed that:

- Except Dholavira, none of the site was included in the tentative list.
- Selection of consultant was non- transparent and was done on nomination basis without tendering.
- Payment of ₹ 38 lakh was released in August 2009, on the basis of a performance report.
- Condition for performance guarantee was waived without justification.
- Scope of work was decreased mid-way by removing two sites (Rakhigarhi and Bhirranna) without proportionate reduction in fees.
- The ASI failed to provide excavation reports of the sites due to which final nomination could not be prepared.
- Contract was faulty as despite non-availability of excavation reports, the ASI accepted the responsibility of providing them.

Extension proposal for Badami and Aihole to the Pattadakal Group of Monuments (2002-03, 2010-12)

Work for Nomination Dossier:

1. Work was assigned to Shri A. Ramanathan and Shri Ranesh Ray at a cost of ₹ 14 lakhs which was enhanced to ₹ 24 lakhs in 2003.

2. M/s ADEI DRONAH was awarded the work at a total cost of ₹ 31.56 lakh (2011).

Dossier was not ready till November 2012.

Irregularities noticed in Audit :

- From ₹ 14 lakhs in 2002 the estimate rose to ₹ 31.56 lakh in 2011 and yet the work could not be completed.
- The consultants in 2003 were selected in a non transparent manner through nomination.
- In 2010 Dharwad Circle issued Expression of Interest (EOI) for selection of consultants. The EOI had a restrictive clause as a result of which only consultants who had earlier worked on WHS projects were eligible. Given the few projects taken up in India, it restricted competition to only the consultants selected earlier.
- In 2011, ADEI DRONAH was awarded work without approval of IFD and the Ministry.
- ADEI DRONAH was selected as it was a Karnataka based consultant. However, such location criteria were not adopted in any earlier consultancy.
- There was no clause for penalty in case of delay.

3.3.2 Preparation and Implementation of Site Management Plans

A site management plan is a document which gives a holistic perspective on conservation and management of the site. Submission of Site Management Plan[20] was mandatory as per UNESCO's Operational Guidelines of 2008. We found that these plans were not ready in the case of 15 out of 19 sites of the ASI. Even where the plans were prepared, these were not implemented on the site.

We observed that the ASI appointed four consultants for the preparation of Integrated Management Plan (IMP)/Comprehensive Conservation Management Plan (CCMP)/Site Management Plan (SMP) for four sites for an amount of ₹ 2.92 crore, out of which a payment of ₹ 2.59 crore had already been made to the consultants. However the work was still incomplete as the CCMP/IMP/SMP had not been finalised by the ASI.

[20] The Site Management plan can be in the form of Comprehensive Conservation Management Plan (CCMP), Site Management Plan (SMP) or Integrated Management Plan (IMP), depending upon the requirements of the site.

Table 3.1 Status of SMPs/IMPs/CCMPs

Site	SMP consultant	Remuneration (₹ in lakh)	Commencement of work	Finalisation of SMP/IMP/CCMP	Status of implementation
Hampi, Karnataka	Nalini Thakur	14.25	2004-05	Not yet finalized	Not implemented[21]
Red Fort, Delhi	Gurmeet Rai	91.46	2005	2007	Not implemented
Ajanta Caves, Maharashtra	Abha Narain Lambah	92.13	2007	Not yet finalised	Not implemented
Ellora Caves, Maharashtra	Gurmeet Rai	94.60	2007	Not yet finalised	Not implemented

IMP for Champaner Pavagadh was being prepared by in house team of the ASI. Process for preparation of IMP for the Taj Mahal, Agra Fort and Fatehpur Sikri had been initiated in 2012. However, the EOI was cancelled in 2012 itself and was yet to be taken up again.

We found that the Site Management Plans were poorly prepared and hence could not be implemented. The plan provided no guidance to the Conservation Assistants and other field staff about the actual management of the site. It was mostly an academic document discussing concepts and theoretical approaches for management of the site.

The ASI was therefore unable to comply with the mandatory requirement of UNESCO for submission of SMPs.

The Ministry stated (May 2013) that IMPs or SMPs were dynamic documents that require phased implementation over several years.

3.4 Site Inspections at the World Heritage Sites

The grant of World Heritage status did not translate into better availability of facilities, funding and staff for these sites. For all practical purposes of conservation, security and maintenance, the ASI did not differentiate between other sites and World Heritage Sites. On these WHS, the total revenue collected was ₹ 320.03 crores against which an expenditure of ₹ 243.96 crore was incurred during the period 2007-12. The footfall of Indian and foreign visitors put together was 887.08 lakh.

Considering the revenue generated from these WHS and the footfall, in our opinion the ASI should have made efforts in ensuring availability of better facilities for the

[21] The Ministry intimated (May 2013) that the IMP of Hampi is already under implementation through a special World Heritage Authority created for this purpose. Several sub sectoral plans under IMP are in various stages of implementation and a formal inclusion of IMP in the Master Plan is under process.

visitors and ensured better conservation and security of these monuments. The information in respect of the visitors, details of revenue and expenditure incurred on conservation is at **Annex 3.3**. During the joint physical inspection, we noticed that different sites had varied issues that related to security, public amenities, encroachment and unauthorised construction, audio guide services etc. (Details in **Annex 3.4**).

3.5 Status of Amenities at World Heritage Sites

Some highlights of the status of Public Amenities, as noticed during joint physical inspections are as follows **(Details in Annex 3.4).**

- At World Heritage Sites of Khajuraho, Madhya Pradesh, Fatehpur Sikri Uttar Pradesh and Champaner Gujarat 628 cases, 194 cases and 107 cases of unauthorised constructions respectively were noticed.
- Encroachments were noticed at five of these sites namely Red Fort, Qutb Minar, Bhimbetka, Hampi and Champaner
- It was noticed that out of 19 World Heritage Sites nine monuments were partly closed to the public. These included Taj Mahal Agra, Red Fort Delhi and Qutb Minar Delhi.
- At 14 out of 19 World Heritage Sites no audio guide service was available. These included sites like Ajanta, Ellora, Khajuraho and Red Fort[22].
- Security Equipments like hand held metal detectors, scanners etc were not available at 7 out of 19 World Heritage sites and CCTV was not installed in 16 out of 19 sites.
- Facilities for differently-abled visitors were not available at 6 out of 19 World Heritage sites viz Humayun's Tomb, Bhimbetka etc

Recommendation 3.3: *The Ministry should develop a separate project for maintenance and security of World Heritage Sites. There should be proper assessment of funds, security and conservation requirements.*

The Ministry (May 2013) accepted the recommendation.

[22] Audio Guide facility in Red Fort, Delhi was started in July 2012.

Case Study 1: The Taj Mahal, Agra



The Taj Mahal Agra is a mausoleum of white marble built by the Mughal emperor, Shahjahan. It is famous for its unique layout, perfection in symmetry and inlay work. Construction of the Taj Mahal was completed within a period of 17 years from 1631 to 1648 AD at a cost of about ₹ 4.0 crore. The Taj Mahal was declared a centrally protected monument of national importance in December 1920. Considered as one of the Seven Wonders of the World, it was inscribed on the list of World Heritage Sites in 1983.

During last five years:

- **0.31 crore foreign and 1.73 crore Indian tourists visited the Taj Mahal, through which the ASI earned ₹ 84.90 crore as revenue.**
- **The total expenditure incurred on the preservation and conservation of the Taj Mahal was ₹ 7.55 crore.**
- **128 employees of the ASI and 275 of CISF were deployed for the maintenance and security of the Taj Mahal.**

However, despite generating maximum resources amongst all the ASI monuments, the maintenance of the site was inadequate as discussed in the succeeding paragraphs. The Site Management plan was yet to be finalised and implemented.

Status of Public Amenities

Adequate public amenities like drinking water, toilets, ramps for physically challenged (upto a certain level) and wheel chairs were available at the Taj Mahal. However, signage in Braille was not available at the Taj Mahal. The cloak room facility was not available at the western gate of the Taj Mahal though most of the Indian visitors entered from this gate. Parking facility was located about a kilometer away from the entry points.

We found that though mentioned at the counter, audio guide facility was unavailable for Korean, Japanese, Chinese and Gujarati languages. The ASI in January 2010, proposed before the Supreme Court to construct Visitors Centres at Eastern and Western gates of the Taj Mahal to accommodate entry ticket counter with a covered queuing area for security, luggage room, information area, waiting rooms and toilets etc. There was also a proposal to set up site interpretation centre. We noticed that the action plan for actual construction was yet to be submitted by the ASI.

Encroachment and Unauthorised Construction in and around the Taj Mahal

We noticed encroachment within the premises of the Taj Mahal near Khan-i-Alam's Bagh. Neither action was taken by the ASI to remove the encroachment nor was it mentioned in the list of 249 encroachments provided by the ASI HQ for all the centrally protected monuments.

We also noticed that only 1 out of 24 unauthorised constructions around the Taj Mahal was demolished. We further noticed that an old temple next to the outside boundary on the eastern gate was constructed without authorisation. The ASI neither took any action nor lodged a complaint with the concerned authorities on these unauthorised constructions.

Preservation and Conservation of the Taj Mahal

We noticed that the Circle office failed to properly preserve the outer boundary of the Taj complex. The left side boundary wall at the eastern gate was in poor condition. No conservation work was carried out by the Circle office on this wall. Large nails were dug into the 400 year old wall and animals were routinely tethered to them.



We also noticed cracks in the outer walls, broken stones fixed in the wall, missing designs, use of cement in the wall, seepage, fixing of plastic pipes, and broken jalis.



Plastic pipe fixed in the wall



Broken jalis of the outer wall



Missing stone and plaster



Inlay work



Stains on the stone



Garden not maintained

Conservation and preservation works inside the monument were also not satisfactory. The plaster was fading at the main entrance to the monument. There were instances of missing inlay designs and seepage. Even the gardens were not maintained properly.



Garden not maintained



Missing design



Seepage on the roof

On the eastern and western side of the main mausoleum, there were Mosque and Mehman Khana respectively. We noticed that not much attention was given to the maintenance of these parts which was reflected in missing plaster, missing designs and seepage.



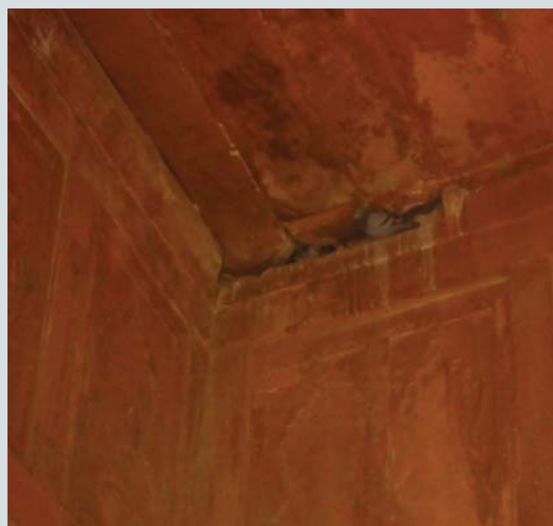
Cement work on wall in the mosque



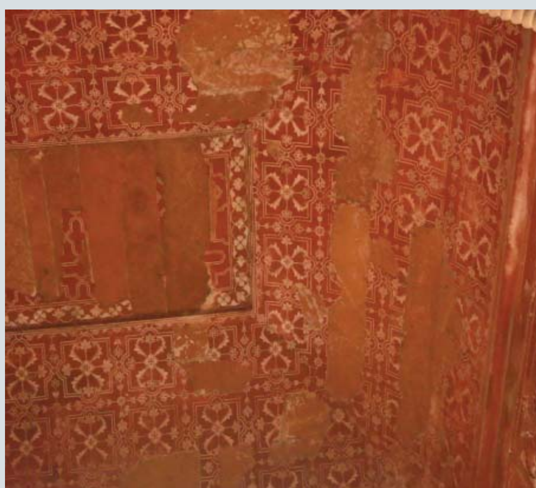
Missing design in the mosque



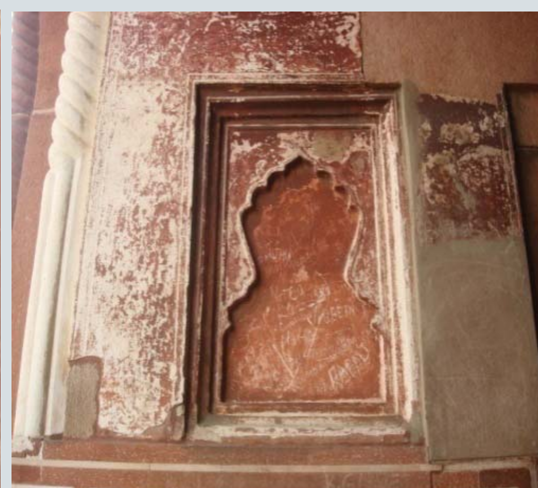
Broken flooring of the mosque



Seepage and cracks in the Mehman Khana



Missing designs in the Mehman Khana



Fading of plaster of Paris in the Mehman Khana

Main Mausoleum

Main mausoleum of the Taj Mahal is the main attraction and heart of the monument. It is a pure white marble structure having inlay works of original semi precious stones. We noticed that certain efforts were made by the Circle office to preserve and conserve this area. However, there were some deficiencies. The ASI stated that because of a large number of visitors at the Taj Mahal, they did not get adequate time for the conservation and preservation of the monument. Lack of coordination mainly among the chemical treatment/cleaning with Circle office works was also noticed. There was a missing design from the main Iron Gate. We found that stones were missing, white floral designs had turned black and cracks were also noticed in the design.


Black stains at the marble designs


Patch work on the marble design


Broken floral design


Patch work of the inlay work

The Science Branch with the help of UNESCO established a stone conservation laboratory in Agra in November 2006. The lab was to check the quality of stone prior to use in works. We noticed that ₹ 1.35 crore was incurred on account of stone flooring in the campus during 2007-08 to 2011-12. However the quality of the stones used was not checked in the stone conservation laboratory.

Case Study 2: The Red Fort, Delhi



Red Fort, Delhi

Brief History

The Red Fort was constructed by Mughal emperor Shah Jahan in 1648 at a cost of ₹ one crore. Red Fort a massive military fortification, also housed the administrative headquarters of the empire as well as royal palaces. The art work in the Fort is a synthesis of Indian, Persian and European art. It also represents the zenith of Mughal architecture. In 2007 the World Heritage Committee inscribed the Red Fort, Delhi as a World Heritage monument.

During last five years,

- Seven lakh foreign and 1.17 crore Indian visitors visited the Red Fort, through which ASI earned ₹ 25.59 crore as revenue.
- The total expenditure incurred for the preservation and conservation of Red Fort was ₹ 15.77 crore.
- 119 private security guards and 317 CISF personnel were deployed for the security of the Red Fort.

Notification

The monument was notified in February 1913 and it includes some parts[23] of the Fort. Later another notification was issued in July 2002 to cover some additional parts[24] of the Fort.

As a result of notifications, the Red Fort was treated as two different monuments by ASI HQ and Circle office (as per the list of 174 monuments in Delhi Circle), whereas the inventory of Delhi Circle published by the ASI showed Red Fort as one monument and mentioned the second notification as supplementary to the first notification.

Unauthorised Closure of monument or its parts

Hamam, Moti masjid and *Baoli* in Red Fort were permanently closed for the visitors without the approval of the competent authority. It was also noticed that there were restrictions to visit the Mumtaz Mahal, Khas Mahal, Diwan-e-Khas etc for the general public. Even visitors were not allowed to closely see the takht at Diwan – e-Aam and Diwan – e- Khas.

Encroachment and Unauthorised Construction

It was noticed that parts of Red Fort were being used by officials of the ASI and security staff for residential purposes. DG ASI, DSA and CA of Delhi Circle were staying inside the Fort. Security guards both of CISF and private security agency were also staying inside the monument. There were many offices situated in the Red Fort complex viz the Institute of Archaeology, Hostel, Office of National Mission of Monuments and Antiquities, Office of Science Branch, Horticulture Branch, CA's office and office of the Commandant, CISF.

It was also noticed during the joint physical inspection that temples and mazar also existed in the Red Fort Complex and appeared to be used for regular prayers though not authorised. This was not communicated to the Circle/DG office and was not included in the list of monuments, where unauthorised prayers are being held.

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[23] Naubat Khana, Diwan – e- Aam, Mumtaz Mahal, Rang Mahal, Baithaka Musamam Burj, Diwan –e- Khas, Moti Masjid, Sawan and Bhadon pavilion, Shah burj, Hamam with all the surroundings including the gardens, paths, terraces and water courses (Lal Qila).

[24] Delhi fort of Lal Qila, Asad burj, water gate, Delhi gate, Lahori gate, fortification wall, Chhatta bazaar and Baoli.



Residence of DG, ASI at Red Fort



Accommodation provided to CISF



Mazar inside Red Fort



Temple inside Red Fort

Public Facilities

- Audio guide facility started in July 2012 only in two languages i.e. English and Hindi.
- Visitors had to walk more than a kilometre to reach the ticket counter either from the nearest bus stop or from authorised parking lot.
- No CCTV cameras were installed at Lahori Gate. At Delhi Gate no CCTV camera and metal detectors were installed. No system was in place for security check of the vehicles entering the premises of Red Fort.
- No Braille facility was available at the monument for visually impaired people.

Comprehensive Site Management Plan (CCMP)

The ASI prepared the CCMP in 2007-08 through a consultant at a total cost of ₹ 91.46 lakh. However, the CA informed that CCMP was not practical and it was difficult to implement. Important issue like overhead wiring was not mentioned in the CCMP. Thus the expenditure was rendered wasteful.

Non Receipt of Revenue

The contract for managing the parking at the Red Fort was awarded to an ineligible contractor[25] in September 2010. The contractor stopped depositing the money from July 2011 and the total dues against the contract as on 31 May 2012 were ₹ 1.14 crore including electricity charges and penalty.

Organising Cultural Events

The terms and conditions of permission for organising cultural event in Red Fort garden were not adhered to by the organisers of the annual Ram Leela.[26] The ASI did not take any action against them. The ASI also waived off the prescribed fee of ₹ 50000/- per day stating that it was a religious function. (**Refer Para 2.8.5**).

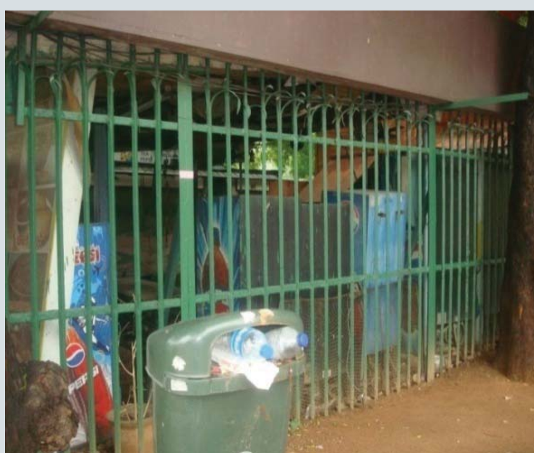
Physical Condition of the Monuments

Joint physical inspection of the complex revealed that it required widespread preservation and conservation; further some parts were in a dilapidated condition and needed immediate attention. The details are as follows:

Improper conservation works on the walls, dilapidated conditions of the stones were noticed at Lahori Gate.



Main entrance at Lahori Gate



Closed shop near Chhatta bazaar

Naubat Khana and Diwan – e-Aam

Many stones at the entrance gate of the Naubat Khana were seriously damaged and signs of improper conservation work carried out at the gate were easily visible. The floral design was replaced with different colours and the work done was also a patch work. Cement work was also noticed on the monument. The *takht* was covered with a net to protect it from pigeons and bats. However, pigeons were able to enter

25 The firm did not have the requisite experience in the related field
26 M/s Lavkush Ramlila Committee and M/s Nav Shree Dharmik Lila Committee

inside the net and the purpose was defeated. The net was also spoiling the overall aesthetic appeal of the place. Widespread seepage was noticed on the ceiling of the Diwan-e-Aam. The rear wall had a number of cracks and required chemical treatment. The brackets holding the structure were falling off and needed to be conserved immediately.



Missing Plaster



Missing floral design



Rear of Diwan-e-Aam in need of chemical cleaning

Diwan-e-Khas

Efforts were made to restore the design of the walls to its original shape however, the work was abandoned midway. This area also required proper chemical conservation.



Missing design on the wall



Test work carried out on one pillar

Sawan and Bhadon Pavillion

Chemical conservation work was not carried out uniformly in all the areas. The *Hyat Baksh* garden between these two pavilions were found to be lacking maintenance. We noted that there was a lot of wild vegetation and the water channels were in a damaged state. The pathways also needed restoration.



Inlay work carried out at Sawan Pavilion



Improper maintenance of Hyat Baksh garden

Jafar Mahal and *Baoli*

Jafar Mahal, a red sand stone structure used to be filled with water. The jalis were found broken, a lot of vegetation, seepage and cement work were also noticed. There were areas where stones were missing; there was no plaster on the bricks and water logging was seen on the floor. The *Baoli* at the Fort needed immediate attention for preservation. The stones and some portion of the wall of the *Baoli* was found broken and a lot of vegetation was noticed. The garden next to the *Baoli* was in a completely unkempt condition.



Missing stones and water logging in Jahaz Mahal



Stagnant water in Baoli



Improper maintenance of Baoli

GE Building

The British-era GE building was occupied by the Office of the National Mission on Monuments and Antiquities. Several modern equipment and fixtures like ACs, electricity fittings, ceramic tiles etc. were installed there. The pathways were covered with grass highlighting poor maintenance.


British period building at Red Fort


Improper maintenance of pathways and gardens

The above observations make it clear that this symbol of our national pride and a World Heritage Site, had not received the care and protection it required. The ASI officials highlighted the issue of shortage of funds and manpower. However, we found that a comprehensive assessment of preservation works and funds requirement had never been carried out. No concrete efforts were made to obtain funds through the NCF or any other alternative route. No proposal for comprehensive preservation of the Monument was put up to the Ministry for separate funds allotment. The Ministry on its own failed to take any initiative in this direction.

Case Study 3: Ajanta Caves, Aurangabad



Brief History: The rock cut caves near Ajanta contain perfect specimens of Indian Rural Paintings. These were discovered in 1819 by British Officers while hunting. They were excavated between second century BC and seventh century AD. They were excavated in a semi-circular scarp overlooking a narrow sinuous gorge. The total area of painting at Ajanta Caves was approximately 2994 sq mts. The caves were notified in November 1951 and inscribed as World heritage list in 1984.

During last five years:

1.17 lakh foreign and 15.4 lakh Indian tourist visited the Ajanta Caves through which ASI earned a revenue of ₹ 4.97 crore.

The total expenditure incurred for the preservation and conservation of Ajanta Caves was ₹ 7.19 crore.

The strength of private security guards deployed was increased from 22 to 42 in 2011. State police also did patrolling in the Ajanta Caves.

Site Management Plan

Site Management Plan was under preparation by an external consultant and an expenditure of ₹ 81.10 lakh had been incurred on it.

Security

We noticed that private security guards were engaged in the sale of entry tickets also. No scanners and CCTV were available at the site.

Status of Public Amenities

- No toilet facility was available for the physically challenged.
- There was no audio guide facility at the site.
- No cloak rooms were available for the visitors.

Conservation

The identification and execution of the projects of chemical conservation of the paintings and other monuments of the Ajanta caves was the responsibility of the "Field laboratory at Ajanta' under Science Branch. An analysis of the chemical conservation and preservation carried out on the paintings at Ajanta, revealed the following:

1) There was no mechanism for monitoring and evaluating the results of cleaning and fixing responsibility against defective execution.
2) There was no laid down documented policy for chemical cleaning/conservation of the paintings.
3) Inventory of the paintings had not been prepared.

Financial Assistance from Japan Bank for International Co operation (JBIC)

The Government of India (GOI) signed an agreement with Japan Bank for International Cooperation (JBIC) in 1992 for phase I and in 2003 for phase II. An expenditure of ₹ 17.03 crore was incurred during both the phases. The objective of the project was "to conserve and preserve monuments and also natural resources around and improve the infrastructure and visitor management, carry out tourist development activities and training programmes for higher quality of the life of local population in Maharashtra, predominantly in Ajanta".

Present Condition:

- The unstable micro climatic conditions in the caves affected the state of conservation of the mural paintings. Due to the impact of variation in relative humidity, a portion of painted plaster along with mud had fallen from its stone carrier. Falling of white pigments from the ceiling of cave No.2 was also noticed.

- The thick coat of protective layer applied on the paintings by the earlier restorers, accumulated dust, soot, excreta of bats etc had created an obscuring haze over the murals.

- The solvents, chemicals, etc. used for cleaning were changed frequently and the indiscriminate use of solvents caused chalkiness on the paintings.



Cave Number 17 East wall, Removal of chalkiness

Impact of visitors

The National Environmental Engineering Research Institute (NEERI) Nagpur was identified (July 2012) to carry out capacity study of the caves and the project was in progress. Entry of visitors was to be restricted to 40 inside the caves but this was not enforced leading to a reported increase of six to seven *per cent* in relative humidity.



Crowd of visitors in Cave Number 2

The impact of visitors inside the cave also increased carbon dioxide concentration. This highlighted the need for controlling the number of visitors inside the caves at a time. Also no emergency evacuation plan has been prepared till date.

Keeping in view the high influx of visitors and fragile condition of the caves, Maharashtra Tourism Development Corporation (MTDC), in August 2012, initiated a project to create a replica of these caves with the aid of foreign technologies and financial assistance from JICA.

CHAPTER – IV

Preservation and Conservation Works

Preservation[27] and Conservation[28] of ancient Monuments is a multi-disciplinary activity which requires support of researchers, technicians, architects and historians.

The principles guiding the preservation and restoration of ancient buildings should be agreed and be laid down on an international basis, with each country being responsible for applying the plan within the framework of its own culture and traditions[29].

This calls for standards of planning and execution of preservation and conservation works. The ASI and the Ministry were found lacking in the areas of policy formulation, setting standards, monitoring and documentation of conservation works.

The conservation and restoration of monuments must have recourse to all the sciences and techniques which can contribute to the study and safeguarding of the architectural heritage[30].

4.1 Adequacy of Policy, Guidelines and Monitoring

4.1.1 Lack of Conservation Policy

The ASI did not have an updated and approved Conservation Policy to meet its requirements of preservation and conservation. There were no compiled instructions for the Circles. The ASI stated that it was following the conservation manual of Sir John Marshall, which was published in 1923. Besides, ASI was also following the Manual of Archaeological Survey of India, published in 1984, and Archaeological Works Code which were more than 30 year old.

In the absence of a comprehensive conservation policy, the performance evaluation of these agencies was found highly subjective. The process of revising the Manual and Works Code which had started in August 2011 did not yield any result till December 2012.

[27] Preservation: The activity of protecting a monument from loss or danger
[28] Conservation: The activity relating to maintenance of monument in its present shape
[29] International Charter for Conservation and Restoration of Monuments and Sites (the Venice Charter 1964)
[30] The International charters for conservation and restoration of ICOMOS

4.1.2 Ineffective Monitoring by the ASI HQ

As pointed out earlier, the Circle offices were responsible for carrying out the works for preservation and conservation of the monuments. As per the ASI Works Code, the Superintending Archaeologist of the Circle was responsible for reporting any irregularity during the execution of the work and for maintenance of the documents. The DG ASI was overall responsible for monitoring the performance of the Circle in-charge.

We noted the following irregularities in carrying out conservation works:

- ✓ No mandatory requirements for inspection by Superintending Archaeologist were prescribed;
- ✓ Non preparation of inspection notes after site inspection,
- ✓ Absence of complete documentation of the works estimates,
- ✓ Faulty budgeting of the conservation works resulting in inclusion of extra items,
- ✓ Delays in completion of works and
- ✓ Non preparation of completion reports along with photographs after conservation.

4.1.3 Status of Monuments as per Joint Physical Inspection

We carried out joint physical inspections of 1655 (45 *per cent*) monuments along with the staff members of the Sub Circle offices of the concerned monument. The inspection revealed many conservation issues and concerns, some of them were as follows:-

- ✓ In 63 monuments plaster were coming off.
- ✓ In 78 monuments vegetation was not properly cleaned by the Sub Circle offices.
- ✓ In 33 monuments, walls of the monument had developed big cracks requiring immediate repairs.
- ✓ 64 monuments were in need of urgent chemical treatment/cleaning. These included monuments like temples at Hampi in Bengaluru Circle, temple of Lakshmi Narayan in Aurangabad Circle, Bidar Fort in Dharwad Circle and Jantar Mantar in Delhi Circle.
- ✓ As per the accepted conservation principles, the ASI prohibited the use of cement on the monuments. Even the John Marshall's conservation manual instructed the same. However in 64 monuments, cement was used on the

main structure of the monument. These included the Taj Mahal, Fatehpur Sikri and Jhansi Fort in Agra Circle; Gulara Mahal in Bhopal Circle and Baijnath Temple in Dehradun Circle.

- ✓ In 63 monuments, seepage was noticed.
- ✓ In 33 monuments either the design/structure of the monument was changed or decoration was obliterated.
- ✓ In three monuments modern tiles were used on the monuments which changed the original appearance of the monuments.
- ✓ In 40 monuments, some part of the wall or the domes of the monument was broken since long. However, no action was taken by the ASI to repair these.
- ✓ In 16 monuments, original stones and tiles were missing from the monument.
- ✓ In 12 monuments garbage/*malba* was lying in the monument.
- ✓ There were three monuments where the roof of the monument was found damaged and big cracks were noticed. For e.g., vaulted roof of upper and lower basement in the Vice Regal Lodge in Shimla Circle.

The cases highlighted above indicated the need for the ASI to implement the Conservation Policy in conformity with the laid down provisions.

4.2 Conservation Documentation

4.2.1 Maintenance of Log Books of Conservation Works

"The recording of the cultural heritage is essential to permit informed management and control of construction works and of all changes to the cultural heritage and to ensure that the maintenance and conservation of the heritage is sensitive to its physical form, its materials, construction, and its historical and cultural significance[31].

For the appropriate conservation to take place at a site, it was essential to have adequate information on earlier conservation efforts including details of material used, changes made, architectural drawings etc. We noticed that earlier the ASI maintained Log Book for each monument which had all the information in respect of the works carried out at the monument. However, we found that this practice was not being followed any more.

[31] Principles for the recording of Monuments, Groups of Buildings and Sites (1996) ratified by the 11th ICOMOS General Assembly in Sofia, October 1996.

There were three separate branches of the ASI viz. the Circle (structural conservation), Horticulture (environmental) and Science (chemical cleaning and treatment) to take care of various aspects of conservation. Due to lack of coordination between these Branches and abysmal state of monitoring by ASI HQ, details of expenditure incurred and conservation efforts made on a particular monument were not available in a comprehensive manner.

Incidence of poor documentation was also evident in the Horticulture Branch where we found that the Directorate of Horticulture did not have adequate information in respect of the total number of gardens and original heritage gardens. The Directorate of Horticulture intimated that the total number of gardens was 504 whereas the combined figure from its four divisions stood at 525. Similarly as per the Directorate office, total number of gardens with original designs was 60. However, the figures did not tally with the response of their own divisional offices.

In the absence of any authentic documentation, it was difficult to fix responsibility for a damaged portion, incomplete work of repair etc. For example, the use of cement was prohibited in the protected monuments. We found many cases where cement had been used. However, in the absence of documentation, it was difficult to fix responsibility or determine any details of the irregularity.

We found that in 1984, the Mirdha Committee had also emphasised the need for such documentation by stating that maintenance of the Log Book of the monument with complete details of the work carried out should be properly recorded for future references. However no action was taken by the ASI on this recommendation of the Mirdha Committee.

4.2.2 Maintenance of Work Related Records

The Archaeological Work Code prescribed maintenance of the following records for the documentation of any conservation work undertaken at a monument:

1. Cash book (form TR 4)
2. Measurement book (form CPWD -92)
3. Tenders and contract documents like contractor's ledger, tender sale and opening register, agreement and security deposit register
4. Estimates including register of deposit works and sanctioned estimates
5. Other works records like registers of tools and plants, unpaid wages and cement stock register etc

In addition, documentation of the details of labour in the form of labour registers, daily labour report etc. were also required to be maintained.

We observed that many Circles viz Delhi, Agra, Lucknow and Bhubaneswar did not maintain the register of works and thus year wise details and item-wise expenditure incurred on various conservation works could not be ascertained.

Recommendation 4.1: *The Ministry should develop a Comprehensive Conservation Policy and update its Manuals and Works Code. The ASI should make it mandatory to maintain log books for each protected monument with detailed documentation of all conservation efforts.*

Recommendation 4.2: *Maintenance of work related documents should be a responsibility of the head of the Circle/Division, which should be monitored regularly by the ASI HQ on test check basis.*

The Ministry (May 2013) accepted the recommendation and intimated that necessary instructions were being issued.

4.3 Irregularities in Planning of Conservation Works

Table 4.1 Irregularities in planning of conservation works

Sl. No.	Irregularity	Details
1.	Criteria for selection of Monuments for conservation	• ASI was not following the procedure prescribed in John Marshall Manual of Conservation. • There was no system of assigning priorities across various works in Circles/Branches. • Works were taken up mostly in ad-hoc manner as per the subjective assessment of the officials.
2.	Monuments without special repair work/annual maintenance work	• No prescribed criteria for planning and prioritisation of monuments taken up for conservation works. • ASI HQ could not provide monument wise information of special repairs and annual repair works. • In 765 monuments, no special repairs were taken up and in 691 monuments no annual conservation work was carried during the period of audit.

3.	Delay in submission of Revised Conservation Program (RCP)	• There was a delay of upto 69 days in submission of RCPs by the Circles/Branches to DG ASI which was required to be submitted by February of the year for the works which were to be carried out in the next financial year. • This delay in the first step of the conservation works had a cascading effect and led to further delays at all the succeeding stages.
4.	Scrutiny of RCP at ASI HQ	• ASI, HQ was not receiving the expenditure statements from all the Circles/Branches regularly. • There was no scrutiny of the expenditure statements that were actually received. • For Example, Special repairs of Hauz Khas Complex in Delhi Circle reflected the estimated expenditure as ₹ 14.63 lakh in RCP of 2010-11 and further requirement for 2010-11 and 2011-12 was ₹ 83.81 lakh and ₹ 10.00 lakh respectively.
5.	Works approved but not carried out	• In five Circles[32], 103 works worth ₹ 5.37 crore approved by DG, ASI were not taken up during the year. • No reasons were found on record for not taking up the works approved by DG ASI.
6.	Estimates without assessment	• Approved budget and expenditure incurred on the works did not tally in Delhi, Srinagar and Jaipur Circles. • Difference in the approved budget and expenditure ranged up to 266 *per cent.* • DG, ASI did not ascertain the reasons

[32] Shimla, Ranchi, Goa, Guwahati and Delhi

		for the substantial variation between approved budget and actual expenditure.
7.	Works carried out without inclusion in RCP	• 30 works of ₹ 4.54 crore and 8 works of ₹ 23.29 lakh in Delhi and Goa Circle respectively were carried out without inclusion in RCP. These works were not planned while preparing the annual conservation programme.
8.	Inclusion of non plan items in plan budget heads	• In four Circles[33], the RCP submitted for special repair works for ₹ 10.37 crore included works of recurring nature which should have been included in the list of annual repairs such as clearance of vegetation, grill fencing, works on pathways etc. • Expenditure on maintenance of the gardens related to the World Heritage Sites and the ticketed monuments was wrongly booked under the plan heads. • In Science Branch, during 2007-08, an amount of ₹ 17.97 lakh was incurred on the items such as purchase of laboratory equipment, running of science lab, annual maintenance contract of the equipment etc. by divisional/zonal offices.
9.	Inclusion of plan items in non plan budget heads	• Conservation work of Flag Staff Tower in the Delhi Circle was carried out during 2011-12 at a cost of ₹ 7.04 lakh. The items of work included dismantling of old decayed plaster, carrying out thick lime plaster on monument and laying of thick concrete on terrace. • It is worth mentioning that special repair works needed approval of Director General whereas the annual repair works were approved only by SA of the Circle.

[33] Delhi, Bhopal, Ranchi and Srinagar

10.	Office expenditure through conservation budget heads	• In the 176 Sub Circle offices, expenditure on purchase of computers, printers and cartridges, water coolers, travelling etc. was met from the budget head of Minor Works (Non Plan) which was specifically meant for the conservation and preservation of monuments as no budget was provided to these Sub Circle offices under the head office expenses.
11.	Incomplete Works	• Cases were noticed where the special repair works were left incomplete like the conservation work of Vittala temple in Bengaluru Circle, started in 1999-2000 left in midway.
12.	Unauthorised expenditure on unprotected monuments	• several cases were noticed where Circles were incurring expenditure on the monuments which were not protected under AMASR Act. • Delhi Circle incurred ₹ 18.67 lakh on Jama Masjid, an unprotected monument. Dehradun Circle incurred expenditure on unprotected temples. Ranchi Circle incurred ₹ 2.30 lakh in 2008-09 on repair of Kolhan Rest House which belongs to Government of Jharkhand. Similarly Hyderabad, Bengaluru and Trissur Circles incurred expenditure on monuments which did not fall under centrally protected monuments.



Pillar lying in the mandapa at Hampi World Heritage Site, Karnataka



Stones lying scattered inside the monument at Ananthashayana Temple, Hampi, Karnataka

The Mirdha committee strongly recommended that important monuments should be identified for thorough conservation including environmental conservation on an integrated development basis. For this purpose, it was necessary that inter-disciplinal teams should be asked to study all the problems at the monuments and lay down guidelines for their conservation. Only then, all the needs of the monuments in respect of their structural stability, chemical preservation of paintings/sculptures, development of environments, landscaping etc. be fully met.

Recommendation 4.3: *There should be standards for the prioritisation of special repair and maintenance of every protected monument. This should form part of the Comprehensive Conservation Policy.*

Recommendation 4.4: *The scrutiny at the DG ASI's office on the estimates received from various Circles needs improvement. Detailed guidelines should be developed in this regard.*

The Ministry (May 2013) accepted the recommendation and intimated that the draft conservation policy will be modified accordingly.

4.4 Improper Conservation Works

A few neglected monuments requiring immediate conservation works are discussed below:

1. Saraswathi Temple, Singanathanahalli, Bengaluru Circle

This temple was situated in a remote area and had no proper access road. It was in dilapidated condition and was badly in need of conservation and proper access.



Dilapidated condition of the Saraswathi Temple, Bengaluru Circle

2. Krishna complex, Hampi, Bengaluru Circle

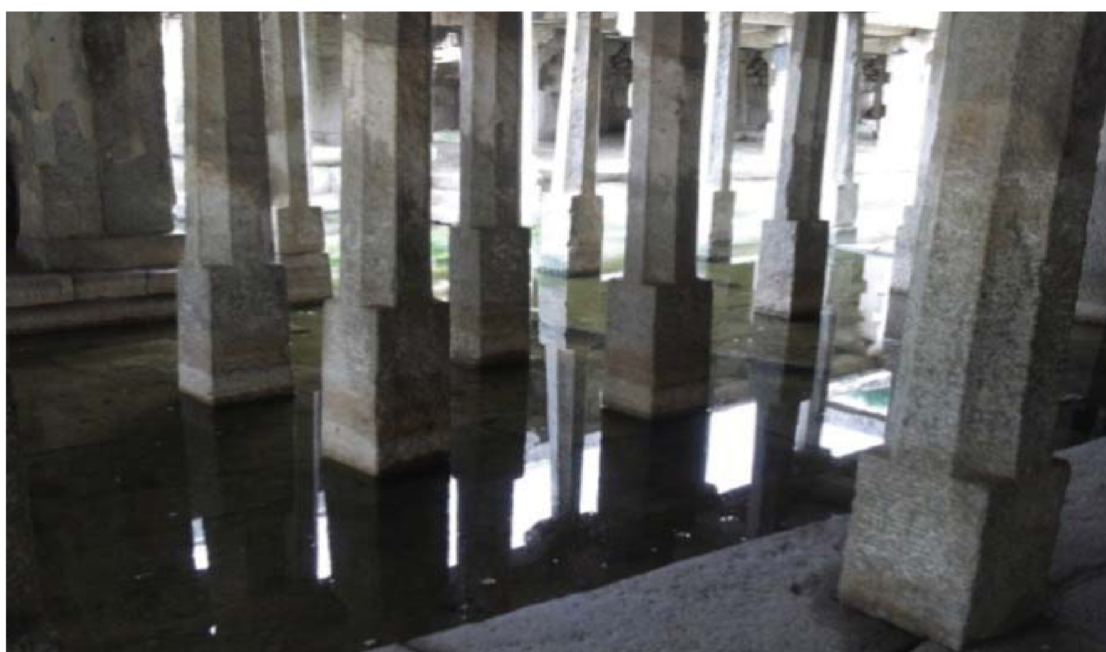
The Mahadwara (main entrance) and stone wall of the temple had developed cracks and needed immediate attention along with other structures inside the complex. The bazaar mantapa in front of the Krishna complex also required conservation.



Cracks in Krishna Temple, Hampi, Bengaluru Circle

3. Underground Shiva Temple, Hampi, Bengaluru Circle

Water logging was noticed at the underground Shiva Temple at Hampi as water from the adjoining fields had entered the temple. Thus, visitors were unable to access the temple.



Water logging in Shiva Temple, Hampi, Bengaluru Circle

4. Fort at Vatakkaottai, Chennai Circle

In the Vatakkottai in Kanyakumari, in the Chennai Circle, out of the four simple pillared mandapas, one of the mandapas was closed by constructing walls and a door. ASI had been using it as a store house, completely altering its original look.



Mandapa's original look and after conversion to store house

5. Fatehpur Sikri, Agra Circle

Agra Circle incurred an expenditure of ₹ 7.45 lakh up to 2005-06 on account of conservation of a Mint House at Fatehpur Sikri against the sanctioned cost of ₹ 15.72 lakh. Conservation work was not carried out in accordance with the norms. The work was declared substandard and was stopped midway following declaration of unsatisfactory work by Assistant Superintending Archaeological Engineer of the Circle. No rectificatory action had been taken since then.





Mint House, Fatehpur sikri, Agra

6. Sangagiri Fort, Chennai Circle

The reconstruction work of Bastion/Fort wall and reconstruction of revetment wall at Sangagiri Fort, Chinnakavaudanur, Salem Sub- Circle was taken up during the years 2006-10. The total expenditure incurred for the two items of works was ₹ 13.61 lakh. Joint physical inspection revealed that both the Bastion/Fort wall and the revetments wall of the temple tank were in a damaged condition even after execution of the work.



Chinnakavandanur, Sangagiri – Fort bastion in a damaged condition



Chinnakavandanur, Sangagiri - Damaged side wall of the lower tank

7. Krishna Temple in a part of Donka with Gopuram, Kalyanamandapam and Masonry built Tank, Kalyanamandapa at Hyderabad Circle

Visible signs of shrinkage and tilting of the Kalyanamandapa was reported by the ASI as early as 1977, suggesting complete repair and conservation. The work of dismantling (sanctioned in 2003-04 for ₹ 60.00 lakh) was completed in March 2006. The DG, ASI accorded (July 2006) sanction for reconstruction of the mandapa with an estimate of ₹ 3.48 crore. The foundation work scheduled for completion by July 2006, was actually completed in August 2009. Subsequently the work was executed departmentally and an expenditure of ₹ 3.55 crore had been incurred as of March 2012.

Thus, lack of proper planning, change in foundation design led to huge increase in the cost of reconstruction and delay in completion of the work.



Before dismantling



After dismantling



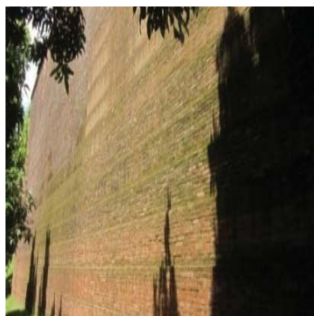
During reconstruction

8. Baisgazi Wall, Malda, Kolkata Circle

The wall had recesses at regular intervals prior to the conservation work. However, the ASI left no such recess in the inner wall, while restoring the northern part of the wall. But recesses were made while restoring the western side of the wall. Thus the conservation work changed the original appearance of the monument.



Original recess in the wall



No recess in the reconstructed wall



Recess in certain portion of the reconstructed wall

9. Jor Bunglow, Bishnupur, Kolkata Circle

The entire four side wall was built with ornamental bricks whereas the patch work as visible was completed with the plain bricks marring the appearance of the monument.



Patch work carried out at Jor Bunglow, Bishnupur, Kolkata Circle

10. Yellow Mosque, Murshidabad, Kolkata Circle

The name Yellow Mosque was derived from its colour; however, the improper conservation carried out by the ASI, completely changed its original appearance. We found that the mosque now had been painted white.



Old view



Current view

11. Ancient Palace of Raja Suchet Singh, Srinagar Circle

The arcaded verandah of the right side of the ancient palace of Raja Suchet Singh in Ramnagar was converted into a lounge with bathrooms and kitchen and a portion was used as office.

12. Great Stupa at Amaravati, Hyderabad Circle

The great stupa or *Mahachaitya* at Amaravati was considered to be one of the biggest Buddhist stupas in India. During the excavation, brick built circular *vedika* or drum with projecting rectangular *Ayaka* platforms in four cardinal were excavated. We noted that the ASI built (2006) an additional circular Vedika or drum with bricks on the existing Vedika. This altered the original identity of the excavated site.



General view of Mahastupa without drum wall



General view of Mahastupa with additional drum wall

13. St. Angelo Fort, Trissur Circle

During the conservation work carried out in 2000-01, the horse stable originally made of lateritic roof in triangular shape was changed to cylindrical shape roof using cement concrete. The conventional air holes were replaced and its original shape and appearance was drastically changed. This was done despite the prohibition on use of cement concrete on the monuments.

14. Tripolia Gate, Delhi Circle

The work order for special repair work of Tripolia Gate was awarded to M/s AIC Building Solutions Ltd. in July 2010 for ₹ 21.97 lakh with the completion date of 8 November 2010.

In November 2011 during a site inspection, Deputy Superintending Archeological Engineer observed that the plaster work executed by the contractor did not match with the original plaster as the original had various block, moulded and ornamental designs besides floral motif above the arches of Gate. The contractor executed plain plaster work instead of the ornamental designs thus defeating the basic purpose of conservation and restoration. However, the ASI made the payment of ₹ 8.17 lakh. The Circle informed the contractor that the work executed by him had altered the very character of the monument and destroyed the aesthetic view of the monument, which would be difficult to restore at this stage. The Circle asked the contractor to complete the work as per the terms of the Work Order followed by verification by the Deputy Superintending Archeologist. This work had not been corrected till the completion of audit. Thus lack of monitoring by the Circle resulted in improper conservation work by the contractor. The work had not been completed even after a delay of more than 32 months.



Tripolia Gate before conservation



Tripolia Gate after conservation (missing designs)

4.5 Preservation and Conservation Works by External Agencies

Conservation is a specialised technical work. Except Delhi Circle, all other Circles of the ASI carried out conservation and preservation work departmentally. No provision was found either in the ASI Works Code or the ASI Manual for executing conservation work through external agencies in the centrally protected monuments. The Works Code however allowed the ASI to receive funding for conservation work from the external organisations. However, in recent years some external agencies like INTACH, Aga Khan Trust etc. were given monuments for conservation and preservation works. Delhi Circle was getting all its works executed through external contractors.

4.5.1 Monitoring of External Agencies

The ASI had no guidelines regarding engagement of agencies to carry out the conservation works. No laid down criteria regarding the qualification and minimum experience in the related field were fixed by the ASI. In the absence of any laid down criteria, the selection of the agency was done on case to case basis. The following instances with regard to lack of monitoring of the works carried out by external agencies were noticed.

(i) The ASI entered into an agreement with Aga Khan Trust through NCF in April 1999 for the conservation, research documentation, reinstating of water systems and illumination apart from restoration of gardens of Humayun's Tomb, Delhi Circle. Aga Khan Trust for Culture (AKTC) entered into another MoU in July 2007 with the ASI for the conservation of the protected monuments within the Humayun's Tomb complex. The AKTC was to arrange

for the funding through domestic or International donors with no financial obligations on the ASI. The Sub Circle incharge of Humayun's Tomb intimated (January 2013) that he was not aware of terms and conditions of the agreement or the time schedule of the work being carried out by AKTC and thus had no monitoring role. This highlights how the ASI has given up its responsibilities as per the MoU.

(ii) The conservation work of five monuments in Lodhi garden complex at Delhi Circle was carried out by Indian National Trust for Art and Cultural Heritage (INTACH) in 2006. The work was given to INTACH as the ASI found itself over burdened with the works associated with the Commonwealth Games 2010. No formal agreement was signed with INTACH and no work order was issued to the firm. The Delhi Circle was to supervise the work. However, it was noticed only in October 2009 that INTACH had carried out faulty and inferior quality of conservation work. An expert committee appointed by the DG, ASI in July 2011 reviewed the work and found the work to be of poor quality and unacceptable. The Committee mentioned that there was poor workmanship, use of inferior material, poor supervision and management of the work. The Committee also doubted whether the work 'repairs to the flat roof' was actually executed as mentioned in the utilisation certification. No corrective action was taken by the INTACH till November 2012 and the ASI also took no action for blacklisting the agency or imposing penalty.

(iii) We also noticed that the ASI entered into an MoU in November 2009 with Global Vaish Organisation for the maintenance of the 'Ugrasen ki baoli' a Centrally protected monument of national importance of Delhi Circle.

Case Study 4 : Ugrasen Ki Baoli



The ASI signed an MoU in 2009 with Global Vaish Organisation (GVO) for the maintenance of Ugrasen Ki Baoli, Delhi. The MoU was not legally vetted by Ministry of Law and Justice. We found that the proposal for MoU was originally from Delhi Pradeshik Agarwal Sammelan (DPAS) but the MoU was finally entered into with GVO. No reasons were found recorded for this change.

The initial proposal was submitted under the National Culture Fund (NCF) scheme, yet the NCF was not made a party while entering into the agreement. Permission of the Ministry was not sought at any stage.



Non maintenance of the monument by the GVO

As per the MoU, Project Implementation Committee (PIC) was to be constituted to define the scope of work, set the target date and time schedule etc. The PIC was not constituted till 2012.

No details were available in respect of the contributions given by GVO to the ASI for the monument as defined in the MoU.

GVO was to print and distribute books, periodicals, leaflets, brochures etc, however, no such work was carried out. GVO was not authorised to use the monument for any meeting, worship or religious activities. We noticed cases where meetings were held in the monument and no action was taken by the ASI. Without any assessment of GVO's performance, the MoU was renewed for five more years in January 2011.



Monument in use as residence by the chowkidar



Porta Cabin erected by GVO

During the joint Physical inspection we found that GVO was running an office in the premises from the porta cabin erected to stock the literature, stationery, computers etc. The chowkidar was residing in the monument permanently. The monument was in a bad condition and there was no water in the *Baoli* any longer.

Thus, ASI had not laid down any procedure for appointing, regulating or monitoring the work of external agencies deployed for the preservation and conservation of centrally protected monuments.

4.5.2 Unauthorised Conservation Works by External Organisations

We found several cases where organisations other than the ASI carried out conservation works on monuments or its parts without the ASI's approval. A few cases are given below:

Table 4.2 Works carried out by other agencies

Sl. No.	Name of monument	Nature of work done	Work Executing Organisation	Expenditure incurred	Remarks
1.	Summer palace of Maharaja Ranjit Singh, Amritsar	Restoration works	Punjab Heritage and Tourism promotion Board	₹ 2.17 crore	No permission given by ASI
2.	Lakes of Kirat Sagar and Vijay Sagar and Tank at Barua Sagar, Jhansi	Conservation works	Uttar Pradesh State Government	--	State Government Authorities unauthorisidely developed a picnic spot and utilised the water for irrigation and drinking purposes
3.	Jama Masjid, Imambara of Amin-ud-daula, Lucknow Circle	Wood and Glass work, Electrification and wooden frame work	Hussainabad Trust, Uttar Pradesh	--	Works undertaken to give a modern look to the monuments

In all the above cases, the ASI took no cognizance of the unauthorised conservation activities carried out on the centrally protected monuments by other agencies.

4.6 Registration of Contractors

As per para 3 of the Manual of the ASI, the registration of contractors in the ASI would be done at the Circle/Branch office, if they intended to operate within the jurisdiction of a particular Circle/Branch. In case, if any particular contractor/firm intended to operate in more than one Circle or Branches their names would have to be registered with the DG, ASI. A half yearly statement giving details of registered contractors was to be submitted to the DG, ASI.

The ASI, HQ intimated that they were not registering any contractor though there were contractors working for more than one circle office. The ASI, HQ was also not receiving the half yearly reports in respect of the contractors registered with the Circles as required in the Manual of the ASI from any of the 24 circles.

The registration of the contractors in the Delhi Circle was carried out without verifying the credentials of the contractors.

4.6.1 Non-recovery of Worker Cess from Contractors

As per the Delhi Building and Other Construction Workers (Regulation of Employment and Conditions of Services) Rules 2002, cess at the rate of one *per cent* of the cost of construction is to be collected and remitted to the Delhi Building and Other Construction Workers Welfare Board after deducting the cost of collection of cess. Delhi Circle carried out the conservation and maintenance works through the contractors; however cess was neither collected nor remitted to the Board. The total expenditure incurred on conservation of ancient monuments during 2007-12 was ₹ 64.64 crore. In response to the correspondence emanated from Deputy Labour Commissioner, Labour Department, Government of NCT Delhi, the Delhi Circle replied (November 2012) that they were not aware of the provision regarding deduction of the workers welfare cess. Given that all the works had now been completed, it would be difficult to recover the cess.

4.7 Conservation Works carried out through National Culture Fund

One of the most important objectives of the National Culture Fund (NCF) was to administer and utilise its funds for the conservation, maintenance, promotion, protection, preservation and upgradation of monuments protected or otherwise.

The ASI supplied two lists of selected 36 and 100 centrally protected monuments in 2000 and 2007 respectively for which funding from donors was requested through the NCF. **NCF was required to select monuments from the list supplied by the ASI**. We noted that there was no priority defined amongst these selected monuments. We also noticed that monuments other than those listed in the two lists were also selected by the NCF for donor projects. e.g. Jantar Mantar, Delhi and the Taj Mahal, Agra. There were no recorded reasons for selecting monuments outside the lists given by the ASI.

It was also noticed that the NCF failed to arrange donors for some of the most important monuments like the Red Fort, Delhi, Agra Fort, Safdarjung Tomb, Ranthambore Fort etc. No documentary evidence was found on record showing the efforts carried out by the NCF to promote these monuments amongst public and private organisations to seek potential donors for the conservation of these monuments. Meetings with prospective donors were not recorded and there were no systematic plans to cover all listed monuments (as suggested by the ASI) over a defined period of time.

Since 1999, the NCF signed 19 MoUs with public and private sector organisations. We found these MoUs not well drafted and cases were noticed where the timeline

for completion of projects was not even mentioned in the MoUs. There was no legal vetting of these MoUs by the Ministry of Law and Justice.

The Ministry (May 2013) intimated that templates for MoUs had been prepared and were being finalised in consultation with Ministry of Law.

Complete details of the item wise expenditure on each project were not being maintained in the NCF. In the absence of this information, we could not ensure that the expenditure incurred on any project was actually for the purpose for which MoU was signed or for the administrative expenses/consultation services only. There was no documentation to provide such assurance even to the donors.

The Ministry (May 2013) intimated that details of scope of work, budget and time line are being included in the MoU for monitoring the progress.

We noticed that out of the 19 projects taken up for the conservation of centrally protected monuments, only two had been completed till November 2012 despite availability of funds with NCF. The details of the projects along with our comments are placed at **Annex 4.1**.

Recommendation 4.5: *To be effective, the ASI needs to prioritise its projects requiring funding through NCF. For this, a comprehensive assessment of funds needs to be carried out in advance.*

4.8 Role of the ASI in the Maintenance of Living Monuments

As per para 26 of John Marshall's Manual of Conservation, living monuments are monuments which were in use at the time of notification. These included temples, mosques etc. As per section 6 of the AMASR Act 1958, the Central Government may enter into an agreement with the owner of the monument for its maintenance and custody and may restrict the owner from destroying, removing, altering or defacing the monument or to build on or near the site of the monument. However, we found that the ASI failed to enter into formal agreement with owners of all of such living monuments.

As the owners were in the actual possession of the monument, they carried out repair and maintenance of the monument as per their understanding and requirement without always considering the historical and artistic value of the monument. In many cases this destroyed the aesthetic value and original look of the monument. The ASI was not able to exercise full authority over these monuments and was unable to stop these activities. In a number of living religious sites like temples, gompas and mosques, it was noticed that alterations had been made by the management without any approval from the ASI. The ASI on its part had no guidelines on the changes that could be allowed considering these were living buildings with evolving needs for extension etc. The present rules placed a ban on any sort of additions/alterations that was practically un-implementable.

Instances were noticed where the trusts/private persons managed these monuments and carried out works in the nature of painting of walls by modern enamel paints, fixing of ceramic tiles and electrical equipments etc. altering the aesthetic value of the monument. Some examples were the mosque in Qutb Minar, the ancient mosque in Palam in Delhi Circle, Shey monasteries, Hemis monastaries in Leh Mini Circle, Bara Imambara and Chhota Imambara in Lucknow Circle and the Churches in Goa Circles.

Recommendation 4.6: *There should be detailed guidelines on management of 'living' monuments.*

Recommendation 4.7: *Documentation on 'non living' monuments should be properly maintained to curb instances of unauthorised possession and use.*

The Ministry (May 2013) accepted the recommendation and intimated that necessary guidelines in this regard are being incorporated in the draft conservation policy.

4.9 Environmental Conservation

The architectural composition of the historic garden included:

- Its plan and its topography
- Its vegetation, including its species, proportions, colour schemes, spacing and respective heights
- Its structural and decoration features
- Its water, running or still, reflecting the sky

Continuous maintenance of historic gardens is of paramount importance. The preservation of the garden in an unchanged condition requires both prompt replacements and a long-term programme of periodic renewal (clear felling and replanting with mature specimens)[34].

The Manual of the ASI stated that till Independence, the horticulture works at centrally protected monuments were looked after mainly by the Central Public Works Department. However, to carry out the works strictly in accordance with the archaeological principles, a separate garden branch was extended in 1952-53. The 'horticulture works' in the ASI included all topographical areas, landscapes, historical parks and gardens, setting up of new gardens, maintenance and renovation of existing gardens, which are of archaeological, historical or aesthetic values. It included supply, repairs, acquisition and transport of machinery, tools, livestocks and other ancillary items essential for the execution of such works.

[34] ICOMOS -The Florence Charter 1981

The main functions of the horticulture branch of the ASI were designing, laying out, renewal and maintenance of gardens and enclosing the areas proposed for development besides providing effective entrances and exit etc.

The ASI's Directorate of Horticulture was in Agra and there were four Horticulture Divisions which had different states under their jurisdiction, each maintaining a large number of gardens. The details are as follows:

Table 4.3 Details of divisions of Horticulture Branch

Division	Location of the Division	Total number of gardens	States covered by the Division
I.	Agra	81	Uttar Pradesh, Madhya Pradesh, Uttarakhand and Maharashtra
II.	Delhi	186	Delhi, Rajasthan, Himachal Pradesh, Punjab, Gujarat, Haryana, Daman and Diu and Jammu & Kashmir
III.	Mysore	126	Andhra Pradesh, Goa, Karnataka, Kerala and Tamil Nadu
IV.	Bhubaneswar	132	Odisha, West Bengal, Bihar, Chhattisgarh, Assam, Sikkim, Tripura and Manipur

We noticed that with the available manpower it was very difficult for the Horticulture Divisions to maintain the gardens and have regular inspection of the works being carried out on these gardens as the area to be covered was vast. The Agra Division was headed by Chief Horticulturist of the rank of Superintending Archeologist but the other three Divisions were headed by Deputy Superintending Horticulturists (DSH). Thus, one DSH was responsible for gardens spread over upto eight states. It was practically impossible for a single officer to monitor all the gardens spread over such a large area.

One particular incongruity noticed by us was that of the garden-in-charge in Hyderabad who had been made in charge of the Buddhist remains of Sankaram, in Vishakhapatnam, which was approximately 592 kms away. Similarly the DSH of Division II was responsible for all gardens from Jammu & Kashmir to Daman & Diu. As a result, monitoring was ineffective, in most of the gardens. The gardens were either not maintained at all or were left to gardeners/labourers without any supervision.

4.9.1 Documentation of the Heritage Gardens

Gardens were part of some of the protected monuments as per their original design. As an integral part of the monuments, these heritage gardens helped us to understand and interpret monuments in proper context. The Horticulture Branch was responsible for the maintenance of such heritage gardens according to the style,

age and temperament of the concerned monument and used period specific flora to retain the original character of the site.

We noted that the divisions were not consulted by the Circle offices to obtain information about monuments sites which included gardens according to the original designs. As a result the division failed to segregate the heritage gardens from other gardens around the protected monuments.

There was no information available with the Horticulture Branch on the original structure, flora and fauna and other decorative features of the historic gardens. There were many gardens around Mughal monuments whose layout and other features were reasonably well documented. However, we did not notice any such garden being maintained with due consideration of its original design.

In many monuments the ASI was even unable to ensure flow of water in fountains and *Neher – e- Bahist* (water channels) which was an important feature of Mughal gardens. These included the Taj Mahal, Agra, Red Fort, Delhi and Itmatuddula, Agra etc.

We did not find any evidence of the ASI's efforts to document or develop heritage gardens through proper research.



Blocked water channels at Humayun's Tomb, Delhi

4.9.2 Non-Maintenance of Gardens

Gardens require maintenance on a daily basis. This includes watering of plants and grass, pruning of plants and cleaning. The Horticulture Branch carried out annual maintenance and upkeep of gardens under the head Minor Works 'Non Plan'. As per the information furnished by Division II, there were 50 gardens in Delhi against 174 centrally protected monuments (which included gardens at the offices of the DG ASI, NMA, NMMA and Children Museum etc.). However during the last five years the number of gardens taken up for annual maintenance ranged from 25 to 37.

Evidently the Horticulture Divisions failed to maintain even the existing gardens.

In contrast, we found that the Branch was maintaining gardens which were actually not pertaining to their jurisdiction. For example, the Division III was maintaining a garden named Chandrashekara garden, Kamalapur, Hampi where there was not even a centrally protected monument.



Chandrashekara Garden with no monument- Kamalapur, Hampi

Joint physical inspection of gardens in and around the protected monuments revealed that the maintenance of gardens were not appropriate. The condition of some of the gardens in the Delhi Circle is depicted in the photographs below:



Indiscriminate Digging: Garden at Safdarjung Tomb



Debris lying in the garden at Humayun's Tomb



Unkempt garden at Purana Qila



Unkempt garden at Red Fort Delhi

Even at World Heritage Sites viz. the Red Fort and Humayun's Tomb of Delhi Circle, gardens were not properly maintained by the Horticulture Branch. The Branch attributed the poor maintenance to lack of human and financial resources. They also pointed out that the Director (Horticulture) requested the DG, ASI several times to increase the strength of the Branch but there were, however, no concrete efforts made by the ASI, HQ so far.

Recommendation 4.8: *The ASI, HQ should accord priority to the Horticulture Branch and provide budget and manpower commensurate with actual requirement.*

4.10 Chemical Conservation and Functioning of Science Branch

The Science Branch of the ASI was established in 1917 with the principal function of chemical treatment and preservation of Museum-exhibits and other antiquities. The

preservation of monuments through chemical conservation had become an important function of the Science Branch. The Science branch was headed by Director (Science) situated at Dehradun, Uttarakhand. The Branch had three divisional offices situated at Bhubaneswar, Hyderabad and Indore and 11 zonal offices spread over the country, besides laboratories at Dehradun, Agra and Ajanta.

4.10.1 Criteria for Chemical Treatment

Similarly, the main criteria for selection of monuments for chemical treatment were on the basis of:

- the observations made during the inspections of monuments by executing staff and senior officers,
- monuments which are not chemically treated for more than 5-6 years
- references from the VIP visits

We found that there was no system in place for regular physical inspection of monuments to assess the requirement of chemical treatment. In the absence of any specific guidelines and criteria for selection of the monument to be taken up for chemical treatment, many monuments which required chemical treatment, were never taken up. Expenditure statement for 2009-10 revealed that only 149 monuments were selected which accounted for four *per cent* of the total protected monuments. There was no justification on record for selecting monuments for treatment. Thus monuments were chosen for chemical cleaning without objective assessment, prioritisation and documentation.

In Dharwad Circle, though 19 proposals were approved for carrying out chemical treatment during the period 2009-10 to 2011-12, only four works were taken up till 31 March 2012. No reasons were recorded for leaving the rest.

4.10.2 Monitoring of Works and Expenditure

As per para 4.1 of the Manual of the ASI, Director (Science) lays down policy for the execution of chemical preservation works and functioning of Science Regional, Zonal and Field Laboratories with the approval of the DG, ASI. It was his responsibility as administrative head of the Chemical Branch to administer the financial grant and with this object in view, keep a close watch over the progress of expenditure.

We noted that work wise details, including physical and financial progress was not being maintained and monitored by either the zonal/divisional office or by Director (Science) office.

4.10.3 Coordination with Structural Conservation

Structural conservation should always precede chemical conservation in the restoration of monuments. However, we found instances where the structural conservation was carried out after the chemical treatment. This nullified the process of chemical treatment. For example, the chemical treatment of Sawan Pavilion at the Red Fort in Delhi Circle was carried out by the zonal office in the year 2010-11 involving an expenditure of ₹ 3.98 lakh whereas the structural conservation of the Sawan Pavilion by the Circle office was carried out in 2011-12 at the cost of ₹ 21.63 lakh.

Recommendation 4.9: *The ASI should devise a mechanism to have a proper coordination between these three branches before carrying out any conservation work on any monument.*

The Ministry (May 2013) while accepting the recommendation, intimated that necessary guidelines have been proposed in the draft conservation policy and instructions are also being issued to field offices.

4.10.4 Functioning of Laboratories

A stone conservation lab was established in November 2006 in Agra fort with the purpose of ensuring that the right qualities of stones are used in conservation works. Each stone was subjected to testing before use in order to assess the physical qualities including colour, water absorption, hardness, porosity and compressive strength.

We found that in the Agra Circle stones used in 13 conservation works during period 2007-08 to 2011-12 costing ₹ 3.44 crore were never tested in the stone conservation laboratory. There were no reasons on record for this violation.

Para 8.3.2 of Archaeological Works Code emphasised that a separate register for the chemical and other consumable stores required for use in the Chemical Laboratory was to be maintained. However, the Head of each office was to ensure proper and judicious use of all Chemicals.

We noticed that chemicals were purchased for the works of Mural Paintings in Shri Guru Ram Rai Darbar, Dehradun and work of preservation of Trident at Gopeshwar, Dehradun. However about 45 *per cent* of chemicals in the case of mural paintings and above 94 *per cent* of chemicals for work on the Trident remained unutilised and were kept in damp store rooms.

In the Bhopal Circle, chemicals worth ₹ 3.66 lakh were purchased during 2005 to 2009 but could not be utilised in time resulting in the expiry of the shelf life.

Besides following deficiencies were also noticed:

- Four[35] out of the nine laboratories (lab) in Dehradun were non- functional for the last ten years.
- Stock registers for scientific equipment and chemicals in the labs were not maintained.
- Detailed accounts of analytical or chemical treatment work carried out in these labs were not maintained as prescribed in the Manual of the ASI.
- The equipment in these labs which were more than two decades old had not been changed inspite of the proposal submitted to DG ASI in April 2008.
- Director (Science) was responsible to finalise the firms and their rates for supply of chemicals to all their field offices. However, this system was terminated after April 2011 without citing any reasons.
- Director (Science) did not take any action against the firms which failed to supply chemicals inspite of the rate contract with them.

4.10.5 Cases of Bad Conservation of Chemical Treatment

The temple of Lepakshi in the Hyderabad Circle was most celebrated for its mural paintings. The paintings revealed the history of the monument and also added aesthetic beauty to it. We noted that despite the chemical treatment carried out on the paintings of Sri Veerabhadra Swamy temple, the same were not visible as there was seepage from the roof and soot formation due to burning of camphor, oil and incense sticks.



Damaged Mural paintings of Lepakshi Temple, Hyderabad

[35] The four laboratories not functional are 1. Geo-Chronological Laboratory, 2.Surface probe laboratory (Electron Microscope), 3. Radiographic Laboratory and 4. Laboratory for study of environmental pollution and application of preventives

Similar instances were noticed in Sri Ramappa Temple, Hyderabad Circle and Ghiyasuddin Tomb in Delhi Circle.





Water seepages in Ramappa Temple after chemical conservation



Stains at the Ghiyasuddin Tomb, Delhi

Chemical conservation work of the ancient Trident cum axe (Parashu) in the compound of the Gopinath temple in Uttarakhand Circle was sanctioned for ₹0.79 lakhs. Joint physical inspection revealed that the work was not properly carried out and rusting was visible as evident from the following pictures.



Rusting on Trident



Rusting on part of a monument

Case Study 5 : Kos Minars



The **Kos Minars** or *Mile Pillars* are medieval milestones that were constructed by the Afgan ruler Sher Shah Suri and subsequently by the Mughal emperors. These Minars were erected on the main highways across the mughal empire to mark the distance (at a distance of 3.2 kilometers i.e. one kos). A Kos Minar was typically a solid round pillar, around 30 feet in height that stood on a masonry platform built with bricks and plastered over with lime. These were an important part of communication and travel in the Mughal period. The ASI protected 110 Kos Minars located at five Circles i.e. 63 in Chandigarh, eight in Jaipur, 15 in Agra, 23 in Lucknow and one in Delhi Circle. Our scrutiny showed that Kos Minars as a specific category of monuments were never researched and analysed by the ASI. In our joint physical inspections, we covered 40 Kos Minars (36 *per cent* of the total kos minars) and found many of them encroached, missing and were in urgent need of preservation. (**Details are in Annex 4.2**).

i. We found no system in the selection of Kos Minars to be protected by the ASI. Many Kos Minars were identified by a particular number like Kos Minar no 13, Kos Minar no 16, 17, 24 and so on. However, there was no information available with the ASI on the missing numbers. In some cases multiple Kos Minars were notified as a single Protected monument viz. 'Two Kos Minar' at Taraf Unsar, Panipat in Chandigarh Circle were notified as a single monument. The ASI was protecting one Kos Minar in Delhi whereas three Kos Minars in Delhi were also protected by the State Archaeology Department of Delhi Government.

ii. Kos Minar No 13, Mujessar, Ballabhgarh in Haryana and Kos Minar in Shahabad, Kurukshetra of Chandigarh Circle were found missing. The ASI was informed by the district authorities (January 1984) that the land of Kos Minar no 13 had been allotted to a private company and the Kos Minar was demolished by the company. No legal action against the company had been taken.

In 2004-05 the land of Kos Minar, Shahabad, Kurukshetra was acquired by the Haryana Urban Development Authority and plots were sold to private parties. At present, several buildings had been constructed there. There was no trace of the protected monument of national importance. The ASI had no information on when and how the monument disappeared.

iii. Out of 40 Kos Minars physically inspected, it was noticed that 20 Kos Minars were without any Protection Notice Board and 36 were without any Cultural Notice Boards explaining their significance and history.

iv. 17 Kos Minars had no access roads. The Kos Minar in Delhi Circle was situated inside the Delhi Zoo and was inaccessible without permission of the Zoo authorities.

Delhi, Lucknow and Agra Circles did not incur any expenditure on the Kos Minar for their preservation and conservation during 2007-12. The Chandigarh Circle incurred an amount of ₹ 36.20 lakh for the conservation of these Kos Minars. 51 *per cent* of the total monuments of Chandigarh Circle were Kos Minars. However, the expenditure incurred on these 51 *per cent* monuments was 0.65 *per cent* of the total expenditure incurred during last five years. Jaipur Circle incurred expenditure amounting ₹ 0.41 lakh on one Kos Minar and ₹ 0.17 lakh on five Kos Minars. Two Kos Minars were never taken up for any conservation work.

v. Joint physical inspection revealed that Kos Minar No. 24 at Banchari, district Palwal in Haryana Circle was in a dilapidated condition. The Kos Minar was situated in a field encroached by nearby farmers. There was no access to the site and the grill fencing had been removed.



Dilapidated condition of Kos Minar No. 24, Banchari

vi. Unauthorised constructions in prohibited/regulated area had been noticed around 21 Kos Minars. Seven Kos Minars had been encroached by farmers and local residents.

Instances of encroachment were noticed in Kos Minars of Jaipur and Chandigarh Circles. The Kos Minar situated at Jaipur- Ajmer road, Ajmer was covered by the residence of the Superintendant of Police (SP), Ajmer and the Kos Minar No. 26 at Hodal, in Chandigarh Circle was situated inside a private house where a wall had been constructed around the Kos Minar, thus covering almost half of it.



Kos Minar No. 26, Hodal encroached by a house



Kos Minar at Jaipur – Ajmer Road, Ajmer encroached by the residence of SP, Ajmer

There was no deployment of monument attendant and security staff at these Kos Minars for their proper maintenance and conservation.

In our opinion, Kos Minars need to be protected uniformly as a single project. The Mirdha Committee also recommended such action. However, no such project was initiated by the ASI for conserving these monuments.



CHAPTER – V

Excavation, Epigraphy and Survey

"Archeological excavation is any research aimed at the discovery of objects of archeological character, whether such research involved digging of the ground or systematic exploration of its surface or was carried out on the bed or on the sub soil of inland or territorial waters of a Member State."[36]

Excavation includes functions such as excavation, exploration, scientific clearance, building survey, temple survey, pre history, underwater archeology and village to village survey. Excavation of archaeological remains has been one of the primary responsibilities of the ASI. As per Sections 21 to 24 of the AMASR Act, 1958 an Archaeological Officer or an officer authorised by him on this behalf or any person holding a license granted in this behalf under the Act, may make excavation in any protected or unprotected area.

The ASI granted excavation licenses, based on the proposals received from different agencies like the ASI Circles, Branches, Universities and Research Institutions every year. The proposals were examined and recommendations made by a Central Advisory Board of Archeology (CABA)[37] chaired by the Minister of Culture and assisted by a standing committee of experts. We noticed the following deficiencies in the ASI's discharge of excavation function:

5.1 Inadequate Documentation and MIS

No centralised information system was maintained at the ASI HQ regarding the functioning of CABA, grant of licenses, reasons for rejection of proposals and status of accepted proposals. Only limited records of meetings held by CABA were available.

5.2 National Policy on Archaeological Excavation and Explorations

The Prime Minister (December 2009) referred to the need for formulating a 'National Policy on Archaeological Excavation and Explorations'. Five Sub

[36] UNESCO, Delhi Declaration 1956

[37] The CABA advises and makes suggestions on matters relating to Archaeology in India

Committees of the CABA were formed to examine specific issues relating to functioning of the ASI and developing policy in those areas.

The Sub Committee on Archaeological Excavation and Exploration finalised the draft on ***National Policy on Archaeological Excavation and Explorations*** and submitted it to DG ASI on 23 December 2009 for approval.

We noticed that these guidelines were still in the draft stage (November 2012) and the file received with Ministry's queries on it was untraceable at ASI HQ. In the absence of any laid down policy, the work of excavation, was being conducted without setting up measurable performance parameters and guidelines. There was no timeframe set for the finalisation of this policy.

5.2.1 Provision for Mandatory Archaeological Impact Assessment

We noticed that the ASI was unable to effectively stop unauthorised excavations. Many sites with rich deposits of archaeological remains were destroyed by developmental activities. There was no provision to conduct a Cultural Resource Management or Archaeological Impact assessment before developmental projects were taken up on the site. We noted that even after five years of rendering assurance to the Parliament in 2007 there was no progress in this matter.

Recommendation 5.1: *The Ministry should ensure finalisation of the National Policy on Archaeological Excavation and Exploration expeditiously.*

The Ministry (May 2013) accepted the recommendation and replied that a National Policy would be formulated.

5.3 Expenditure on Exploration and Excavation Activities

Exploration and Excavation was one of the primary functions of the ASI. We however noted that the ASI was spending less than one *per cent* of its total expenditure on these activities. The option of obtaining funds through the National Culture Fund was not explored despite deliberations on this issue by CABA in 2009.

5.4 Planning and Conduct of Excavation

5.4.1 Selection of Sites and Grant of Excavation Licenses

The ASI did not have any laid down policy or guidelines for selection of sites for excavation. There was no priority list or perspective plan for completion of projects within a given period. We found that excavation licenses were not being given in a

systematic manner to solve cultural or historical debates or questions pertaining to different parts of the country. In the ASI, officers of the rank of Deputy Superintending Archaeologist (Dy. SA)/Superintending Archaeologist (SA) or above were eligible to apply for licenses for excavation. We found that the ASI's own proposals depended on the individual initiative of the SA/ Deputy SA of the Circle rather than any overall departmental perspective.

The table below shows the details of excavation proposals received and accepted during the period of audit.

Table 5.1 Details of excavation proposals received

Field session	No. of excavation proposals received	No. of proposals accepted	
		Proposed by ASI officers	Proposed by others (universities,State Archeology Department etc.)
2007-08	141	22	85
2008-09	142	21	93
2009-10	159	40	92
2010-11	149	23	88
2011-12	137	24	100
	728	**130**	**458**

We found that the ASI did not have information regarding initiation/completion of the 458 excavation works proposed by others. This indicated poor monitoring of excavation works by the ASI.

We also noticed instances of non-transparency in grant of excavation licenses and recommendations made by CABA to DG ASI. As an example, in 32[38] proposals, reasons for rejecting them had not been recorded. The ASI accepted (November 2012) the Audit observation.

[38] 17 of ASI and 15 of other agencies , details in **Annex** 5.1

We also found that some sites were taken up for further re-excavation without availability of the reports of earlier excavations. Reasons for such repeated excavations were also not clear from the records.

During 2011-12, the ASI proposed a program for Ropar which was earlier excavated in 1950s. Similarly, the site for Patne and Raja Vishal Ka Garh at Vaisali were earlier excavated and no reason was found on record for re-excavations proposed by the ASI.

Chandraketugarh archeological site in West Bengal had been excavated six times in the past, four times by Calcutta University and twice by State Archeological Department. However, no report on these six excavations was available. We found that the site had been taken up again for excavation during 2010-11, but was left midway. Further, the whereabouts and inventory of antiquities recovered during previous excavations were not documented, involving risk of smuggling and loss.

5.4.2 Sites Notified but Excavation not Undertaken

We found sites which were notified by the ASI for central protection after discovery of some archeological evidence were not excavated till the end of our Audit (February 2013). In the list of protected monuments, the ASI had many ancient mounds and sites, most of which had never been excavated. A few instances are given below:

- ✓ In Kolkata Circle, the ASI had notified four sites[39] between 1920 to 1963 after discovery of archaeological evidence in them, but these were never taken up for excavation. Bangarh site was taken up for excavation in 2008-09, 70 years after its notification in 1938.
- ✓ In Patna Circle, no excavation work was carried out in the protected sites of Chankigarh in West Champaran district.
- ✓ In Trissur Circle, the biggest site of burial urns in the State was found in Elanthikkara High School ground near North Parur, Ernakulam district. The ASI was aware of this site since 2002 yet no action was taken till 2012. We found that school children were playing amidst scattered pieces of ancient burial urns, the site was neither protected nor fenced.

We also found proposals being taken up for excavation/scientific clearance due to VIP references without any prior archaeological evidence. For example, scientific

[39] i) Devil's Mound and Raja Karna's Palace, ii)Ancient mound known as Barah Mihirer Dhipi, iii) Nadhia, Burdwan, iv) two mounds in Birbhum and Barkuna Deul Mound

clearance conducted at Jyothi, Cuddapah, Hyderabad Circle was without any proper justification of archaeological evidence found there.

Recommendation 5.2: *The Ministry should formulate a transparent procedure for conducting archaeological excavation and document detailed findings of the excavation work in all cases.*

Recommendation 5.3: *The ASI may consider devising mechanisms for preparing a priority list for excavation projects based on importance of the site. The list may be updated annually.*

The Ministry stated (May 2013) that for undertaking excavations there is an established mechanism and the findings of the excavations were recorded as per the due process. However the fact remained that there were many protected sites which despite identification of archaeological evidence decades back , were yet to be taken up for excavation. The Ministry further stated (May 2013) that the ASI would make efforts to prepare a culture-wise list of ancient sites as a part of the overall programme finalised for the NMMA. However, no time frame was indicated.

5.4.3 Approved Excavations Proposals not Undertaken or Left Incomplete

We noted cases where excavation proposals approved by the ASI were not undertaken at all or were left incomplete. The reasons were usually lack of technical staff, labour and shortage of funds. However, there were no attempts in subsequent years to sort out these problems and complete the approved projects.

5.4.3.1 Excavation not Taken up

i. In Chandigarh Circle, during 2007-08, a proposal for excavation work[40] was approved but could not be commenced due to non availability of labour. We found that even though no excavation was undertaken, an expenditure of ₹ 14.98 lakh was incurred on acquiring computer camera, photo-material, stationery and kitchen articles etc. from the funds allotted for excavation.

ii. Excavation license at Modikuppam, Chennai Circle, was granted during 2009-10. However, work could not be taken up due to non availability of technical staff. There was no evidence of any attempt to arrange for technical staff to take up the work.

[40] Buddhist Stupa , Asand, Haryana

5.4.3.2 Incomplete Excavation

i. In Guwahati Circle, Ambari site was excavated many times during 1970 to 2003. In 2009, eight steps of staircase were unearthed from the site but this excavation was left incomplete due to lack of proper plan for water drainage. The ASI did not make any efforts to solve the problem and complete the excavation work.

ii. In 2008, the excavation at Garhgaon in Ahom Raja's Palace, Guwahati Circle was conducted for 17 days and was left after security threats. However, no efforts were made to resume the same after improvement in law and order situation in the state.

iii. In Ranchi Circle, excavation work taken up in Saridkel during 2003-05 was abandoned due to local protest. It was not resumed subsequently.

iv. Scientific clearance was attempted in Benisagar, Ranchi Circle during 2006-07 and 2007-08 but we found during the joint physical inspection that this too was left incomplete. No reasons were found on the record for non completion of work.



Incomplete excavation at Dholavira

The excavation at Dholavira, a major site for Harappan civilisation, was started in 1990. The Officer-in-charge of the excavation retired in 2002 and did not submit any report on the status of excavation so far. In the absence of his report, further excavation was not resumed.

5.5 Protection of Ancient Mounds

The ASI had declared 221 ancient mounds as centrally protected monuments. However, there was no specific policy on the maintenance and excavation of these mounds. The mounds were looked after by the Circles (which conducted structural conservation) and were not supported by the excavation Division. During joint physical inspections, we found that many of these mounds were not fenced and were taken up for cultivation. No action plan had been drawn up by the ASI with regard to protection and maintenance of these sites.


Soil erosion on Nilkuthi Mound

In Nilkuthi mound, Barkona Deul site at Malda, Bangarh site in Kolkata Circle we noticed that the protected sites were not fenced, demarcated and preserved. Consequently unauthorised cultivation work had been going on at the site of Barkona Deul Site and Bangarh Site.

The Ancient Mound, Buxar, another protected site in the Patna Circle had been reduced to just a strip of land due to unauthorised construction. At four Vedic Burial Mounds in West Champaran, Patna Circle we found soil digging, resulting in damage to the excavated area.





Photos depicting soil digging in four Vedic Burial Mounds in West Champaran

The ASI stated (November 2012) that post excavation, maintenance of the site was decided on case to case basis and an unprotected site after excavation, if considered for protection, was usually fenced. We, however, found that even the protected sites were not fenced and maintained properly.

5.6 Status of Excavated Sites

Conservation Manual by John Marshall provided that all excavations were required to be protected from inclement weather. Protection of excavated sites was carried out in several countries including Spain and China. Even the Archeology Department of Gujarat Government installed a protective shed (Iron/PVC/Acrylic) over the excavated site. We did not find any such practice in the excavated sites of the ASI.

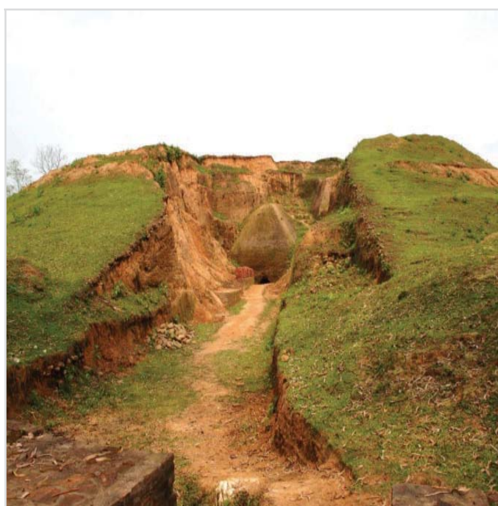
Good practices (International and National) adopted for maintenance of excavated sites



Gran Dolina , Atapuerca Mountain, Spain	Terracotta Army, China	Budhist Monastry, Vadnagar, Gujarat.

However, the excavated sites of the ASI were not being maintained and properly preserved leading to some sites going "missing" and becoming untraceable. Few instances of improper maintenance and preservations of excavations site were as follows:

i. Excavations were conducted at group of four Maidams, Nazira, Sivasagar district, Assam during 2001-2003 and restoration work for ₹ 23.85 lakh was undertaken during 2007-08 to 2011-12. This restoration was not completed and the site lay exposed to vagaries of nature.



Excavated Maidam at Charaideo, Sivasagar, Assam as on 05/05/2010



Current view of Excavated Maidam at Charaideo, Sivasagar, Assam as on 10/06/2012

ii. In Lucknow Circle, protected site called Sandi-Khera, Pali, Shahbad, was not traceable.

iii. In Dharwad Circle, the excavated site of Kanaganahalli, Sannati was not maintained and preserved properly despite many site visits by senior officers and VIP references. We also noticed cases of defective conservation on the site. **(Refer Case Study 6)**

iv. Seven excavated sites[41] in the Vadodara Circle, which were declared as protected between 1951 and 1954 had been completely destroyed/encroached as they were not properly preserved. The mound at Venivadar was submerged and remaining six sites were under cultivation and residential units had come up there.

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[41] i) Ancient mound site, Venivadar, ii) Ancient (mound) site at Sejakpur, iii)Historic site, Akota, Vadodara iv) Ancient site, Gohilwad Timbo, District Amreli, v) Microlithic Site in Amrapura vi) Ancient site in Sihor and vii) Ancient site in Kamrej



Ancient Site at Amreli, Gujarat with houses built on it

v. In Aurangabad Circle, five sites[42] were not traceable.

vi. The most glaring mismanagement of protected excavation sites was however, noticed with respect to world renowned sites of Harappan Civilisations for which the ASI was also seeking World Heritage Sites status. (**Details in the Case Study 7**)

vii. In Halebidu, Karnataka a huge temple complex was excavated during 1984-87. We noticed that excavated sculptures and antiquities were lying around and the complex was fenced only in 2008-09 after a gap of more than 20 years.

[42] viz Jarasangh Nagri at Jorve, Ahmednagar ii)Stone Circle at Arsoda, Gadchiroli iii) Group of twenty Cromlechs at Gadchiroli iv) Stone Circle, Nildho v)Stone Circle, Takalghat, Nagpur

Case Study 6 : Excavation at Kanaganahalli, Sannati (Dharwad Circle)



Excavated site Kanaganahali

In 1993-94, Government of Karnataka approached Bengaluru Circle of the ASI for archaeological clearance for construction of a dam at Bhima river at Sannati. During exploration for this purpose, several pre-historic artifacts, structural remains and ancient vestiges were noticed in the area. After extensive excavations by the ASI during 1996-2002 the remains of a unique Mahastupa (Great Stupa) were discovered at Sannati, near Kanaganahalli. The Site was acclaimed as a rare Buddhist site by the experts. Among other panels, there is a unique panel with a labeled sculptural frieze of King Ashoka, the only one of its type in the world. The 23 acre site was notified in 2003 as a protected site.

Condition of the Site:



Moisture on panels covered with plastic



Scattered panels at the site

Despite incurring an expenditure of ₹ 1.42 crore for the site, during joint physical inspection we found that the excavated parts of the Stupa and the panels were lying scattered in the open, subject to the vagaries of the nature. Water had accumulated

in many parts and black patches had appeared on the Panels. Some Panels were covered with plastic sheets to prevent rain water. However, moisture had accumulated and was damaging these Panels.

DG, ASI in June 2012 had instructed that temporary shelters be provided for the Ashoka Panel and other excavated parts of the Stupa. But this was not done (December 2012). Only a cloth shed was provided for the Ashoka Panel after the visit of Union Minister Shri Jairam Ramesh (August 2012).



Ashoka Panel under cloth shed

We also found that the activities on the site were not being carried out with due care. An unsuccessful mending work was carried out on the Panels by using non-magnetic steel rod and epoxy resins, without proper testing. The Ashoka Panel was repaired by the ASI leaving it damaged.



Faulty Repair works at the site

The inventory of the parts was unavailable at the site. We also found that while making replicas of some panels in 2012, the ASI had used fiber glass as mould instead of softer alternatives like latex. The mould left some glass pieces stuck in the curves of the friezes. The ASI officials then used chemicals followed by oil to remove them, leaving the limestone panels discolored and damaged.

Despite assurances from the Minister of Culture (May 2012) in response to a reference from Shri Jairam Ramesh, Minister of Rural Development, the site remained uncovered and neglected.

5.7 Monitoring of Excavations

Excavations are to be carried out under close supervision and monitoring. Absence of proper technique could result in destruction of valuable material. The ASI HQ informed us (May 2012) that Director (Excavations) as and when visited the excavation sites, gave direction on the site for proper excavation. However, there were no inspection reports on record at ASI HQ. At the excavation sites too, no instructions from the Director or any other higher official from the ASI were found recorded. The ASI accepted (November 2012) that no such records were present as the Director was unable to visit the sites due to his commitments in Headquarters.

***Recommendation 5.4:** The ASI should put in place an effective monitoring mechanism by making inspections documented at ongoing excavation sites, mandatory by Director (Excavation).*

The Ministry stated (May 2013) that informal inspections of the ancient sites are a normal practice by various level of officers. The reply underscores the need for the ASI to undertake inspections in a formal manner and document the results of such inspection.

5.8 Report Writing Work

Writing of the report on excavation is an integral part of any archaeological excavation. An excavation or exploration without proper documentation and reporting of findings becomes a futile exercise because it would not provide inputs for further research and analysis of findings. The UNESCO recommendations also enjoined upon the Member States/excavator to publish results of the excavation work within the period stipulated in the Deed, or, in cases lacking such stipulations, within a reasonable period.

5.8.1 Delays in Report Writing

We noted marked delay in report writing for completed excavations. In 2005, a decision was taken to complete the pending excavation reports within a period of 24 months. Accordingly, the ASI identified pending 56 excavation reports pertaining to the period prior to 2007-08 for completion by 2007 but only 25 reports were submitted as of September 2012. **(Annex 5.2**).

We found reports pending for 57 years in some cases. For some of the major excavations, like Mathura, Sravasti and Ropar the report writing work for the excavations carried out in 1954-55, 1958-59 and 1953-54 respectively, were yet to be completed. It was unlikely that accurate reports could be written at such a belated stage without re-excavation. Given the state of documentation and controls

at the ASI even the preliminary records of the site were also incomplete/ untraceable.

The ASI informed the Ministry (April 2010) that it would not be possible to write reports in respect of two excavations viz. Kunnattur (Tamil Nadu) and Nalanda (Bihar) as the excavated materials were in non living form and unidentifiable. Moreover the excavators were dead. This raised serious doubts over the protocol being followed for safekeeping of records and material from the excavated sites.

Latest consolidated position of pending reports was not available on record. Besides 56 cases discussed in **para 5.8.1**, for the 113 excavations/exploration works that were undertaken by the ASI during 2007-08 to 2011-12, report had been submitted in only 12 cases; out of which only one report had been published in the Indian Archeology-A Review (IAR). Details are given in **Annex-5.3**.

We also noticed that in the absence of the detailed excavation report of Rakhigarhi, the site was dropped from inclusion in the work of the nomination dossier for the inscription of World Heritage List for UNESCO.

The ASI stated (November 2012) that periodic monitoring of the report writing work had been done by the ASI continuously since 2005 and all possible logistic support was given to the report writers to facilitate early completion of reports. The position of pending reports, however, did not support the reply of the ASI.

Some of the major cases of pending reports included:

Table 5.2 Cases of pending report of excavation

Site	Year (s) of excavation done
Ropar	1953-54, 54-55
Mathura	1954-55, 1973-74 to 76-77
Hulas	1978-79 to 1982-83
Dholavira	1989-93, 1994 -95, 1996 to 2004
Sanghol	1986-87 to 90-91
Rakhigarhi	1997-98 to 99-2000
Chichali	1998-99, 1999-2000
Hampi	1975-76,1976-77,1978-79 to 2001-02
Sravasti	1958-59, 1986-87, 1998-99, 2000-01, 2001-02
Ramapuram	1980-81 to 83-84
Banawali	1983-84 to 86-87
Harsh-ka-Tila	1987-88 to 89-90

5.8.2 Reasons for Delayed Report Writing

We noticed that no time was given to the officers of the ASI doing excavation, exclusively for Report writing work and as such there was no specified timeframe. The report writing work was undertaken much after the excavations and for the ASI's own excavations, sometimes after the retirement of the main excavators. This resulted in pending report writing work and also extra expenditure on remuneration of retired officers. We found that expenditure of ₹ 63.75 lakh had been incurred as expenditure for such delayed report writing works.

We also found that 10 excavators, from whom reports were pending, were no more/incapacitated due to ill health and old age and one excavator had left the ASI to join some other organisation. The ASI failed to take effective measures against unusual delays in report writing by its own officers.

The ASI replied (May 2012) that taking stringent measures against unusual delays of report writing by the ASI on officers could not be justified as the officers were overburdened by other administrative activities and untimely transfers which resulted in delay. The reply of the ASI is not convincing as the primary responsibility of report writing by excavators cannot be compromised.

Recommendation 5.5: *While approving proposals for excavation, the time frame should be fixed for submitting and publishing the report and it should be strictly adhered to. The ASI should take adequate steps to address the reasons affecting the report writing work.*

The Ministry stated (May 2013) that despite fixing deadline and timeframe, 30 excavation reports were yet to be submitted for publication. The Ministry also stated that the ASI would explore the possibility of putting in place a system wherein the report writing on excavation can be taken up in a project mode so as to provide assistance to directors of the excavations and achieve the target within a reasonable period of time.

5.9 Status of Excavated Material

Delayed report writing also affected the condition and counting of antiquities found during excavation. Till the final report was published many of the items remained in the custody of the excavator without proper records made available to the ASI.

In some cases, when excavators were relocated, they had been allowed to carry these antiquities from one place to another. e.g. Excavation work at site of Dholavira, Vadodara Circle and Sirpur, Raipur Circle. In Dholavira, the excavated material was not handed over even after a lapse of upto 12 years. In such a situation damage and loss of antiquities lying with the excavators without proper insurance and security, could not be ruled out.

We noticed that no inventory had been maintained centrally, on an All India basis, in the ASI for recording all the artifacts, antiquities and sculptures found and collected during excavations, explorations or village to village survey. In many cases, as discussed in **detail in Chapter 6**, the excavated antiquities were not accessioned and found dumped in the ASI Circle offices, monuments and store rooms.

Recommendation 5.6: *A protocol is required for handing over and maintenance of antiquities with laid down responsibilities and accountability for loss. Proper arrangement needs to be made for storing these antiquities.*

Recommendation 5.7: *The ASI may prepare an inventory of the excavated antiquities and their locations and put it in public domain so as to facilitate its use for reference/research by scholars.*

The Ministry (May 2013) welcomed the recommendations and stated that ASI would formulate a policy that the excavator would prepare a catalogue of antiquities unearthed within three months of the excavation and put up the same for public information through the website of the organisation.

5.10 Other Activities related to Excavation and Exploration

The details of the other activities are as follows:-

Sl. No.	Activities of the ASI	Remarks
1	Village to Village Survey	• Another method for exploration of archaeological evidence. • It is nowadays not undertaken due to shortage of manpower.
2	Under Water Archaeology	• Established a specialist Branch for Underwater Archaeology in 2001. • There was no perspective plan or policy for Underwater Archaeology. • 17 projects had been undertaken till May 2011. • In 2011, the only trained superintending Archaeologist in this field was allowed to proceed on deputation to Assam University. • Another trained ASA and a photographer were posted in Archaeological Museum and Chemical Branch, Jaipur respectively. • The Branch virtually became defunct due to lack of specialised manpower.

3	Building Survey Project	• Established in 1977 with the aim to select domestic and secular buildings pertaining to the 16th to 19th century and document their details. • After documentation, the report if deemed fit, was to be published in the Indian Archaeology - A Review (IAR). The building survey project was located at New Delhi. • During the last five years, only two projects had been undertaken and sent two reports of its earlier projects to Director (Excavation). None of them was published in the IAR. • No recorded reasons for not finding the reports suitable for publication. We could not therefore ascertain the reasons for executing this project without any tangible outcome. • No system of regular monitoring of the project by Director (Excavation). • No criterion on the basis of which the buildings were selected for the projects.
4	Temple Survey Projects, Bhopal and Chennai	• The purpose was to document the invaluable ancient temple art and architectural treasure of our country. • Huge delays in the publication of the Temple Survey reports. • Submitted five project reports relating to the period 1984 to 2011 to DG ASI for publication. However, none of them were published till date.
5	Pre History Branch, Nagpur	• Carried out research in the field of Pre History. • Areas were explored to know the prehistoric remains of the particular area or to reconstruct the entire settlement pattern of the prehistoric culture. • During 2007-08 to 2011-12, 14 reports on prehistory were submitted for publication in the IAR, out of which nine were recommended by CABA but none of them had been published. • There was a huge backlog and works relating upto the year 2003-04 had only been printed in the year 2011.

5.10.1 Archaeological Investigations Using Modern Scientific Methods

The application of modern scientific technology in various fields of archeology is ever growing. Several recent technologies such as Ground Penetrating Radar (GPR), Magnetic and Resistivity Survey, Global Information System (GIS) and Global Positioning System (GPS) were available for excavation. The ASI did not have infrastructure/equipment of its own and the excavations were carried by using traditional methods. For capacity building of the ASI officials, an MOU was signed between the ASI and IIT Kanpur in 2007 regarding application of scientific techniques in archaeology. Two training programmes were organised for plain surveying and GPS, GIS in Kanpur at a cost of ₹ 11.60 lakh and 30 officials were trained.

We observed that only two of the trained officials were actually involved in the ASI excavations that were conducted after 2007-08 using the above technology.

5.11 Epigraphical Studies

Epigraphy is the Branch of study in Archaeology dealing with the deciphering and interpreting inscriptions found in clay, stone or metal tablets and rocks. These Inscriptions were mostly written in ancient languages/scripts, some of which may be lost now. The main function of the Epigraphy Branch was to undertake an epigraphical survey of several states in India and to copy the inscriptions on stone, copper-plate and other materials written in Sanskrit, Dravidian and other languages. After deciphering and transcribing, the inscriptions were listed out in the Annual Report on Indian Epigraphy. However, there were no Acts/Rules/guidelines pertaining to the Epigraphy Branch.

5.11.1 Status of Work and Human Resource for Epigraphical Studies

The Directorate of Epigraphy, which managed the epigraphy work of the ASI, was headquartered at Mysore and had three zonal offices at Chennai, Nagpur and Lucknow. We noted the following:

i. No Director had been appointed since October 2006.

ii. There were two posts of Superintending Archaeologist which were lying vacant since 1998 and 2004 respectively. Men in position were 25 as against the sanctioned strength of 45.

iii. We found that 1725 epigraphic items were collected during 2007-08 to 2011-12. However, the Annual report on Indian Epigraphy had been compiled and published only upto 1997-98. Due to improper assessment and lack of publicity, there were unsold publications to the extent of 43464 volumes of this report, valued at ₹ 53.17 lakh as at the end of March 2012.

iv. South Indian Inscription volumes in Tamil, Telugu and Kannada were published on the inscriptions collected up to 1955. Remaining inscriptions were yet to be published. Works assigned to six departmental scholars during 1995 to 2011 and to three external scholars during 2009 were pending. It informed that no work on North Indian Inscriptions (Sanskrit) had been carried out due to paucity of staff.

v. Only seven volumes of Corpus Inscriptionum Indicarum[43] on inscriptions of various period/dynasties written by different authors were published. No specific targets or planning was done for these volumes.

vi. In the Epigraphy Branch, Chennai Zone, 5440 epigraphic items were collected during 1991-92 to 2011-12. However only 2383 inscriptions collected upto 1998-99 were transcribed and the remaining 3057 (57 *per cent*) were yet to be transcribed.

Transcription and publishing of Telegu inscriptions collected during the year 1936-38 and editing of Telegu inscriptions for the year 1939-45 was yet to be done. South Indian inscriptions collected during the years 1916 and 1905 were yet to be transcribed and published.

Epigraphy Branch, Nagpur which was responsible for copying, accessioning, deciphering and publishing Arabic and Persian inscriptions had deciphered 297 (80 *per cent)* inscriptions out of 367 numbers of inscriptions collected during 2007-08 to 2011-12.

In the zonal office, Lucknow, though an expenditure of ₹ 1.04 crore was incurred during 2007-08 to 2011-12, no inscription was copied, deciphered, interpreted and printed in the Annual Report on Indian Epigraphy.

5.11.2 Non Publication of Inscriptions

During the period 1997-98 to 2011-12, total 644 transcribed inscriptions from Chennai Branch and 31 inscriptions from Epigraphy Branch, Nagpur were forwarded to Director General, ASI, New Delhi for publishing in the ***Annual Report on Epigraphy***. However, no report had been published till now. There was an inordinate delay extending upto 12 years in the publication of Annual report on Indian Epigraphy. Works relating to 1997-98 had been published in the Annual Report of Epigraphy in 2011.

[43] Corpus Inscriptionum Indicarum is a specialized volume containing detailed description and critical notes on inscriptions belonging to a particular dynasty or a particular period of history.

5.11.2.1 Preservation of Impressions/Estampages

Estampages are paper impression of stone or copper plate inscription. Estampages are preserved in a controlled environment to stop deterioration. There were 72000 estampages with the Directorate of Epigraphy out of which 3105 estampages were under the custody of the epigraphy Branch, Chennai. These estampages in Chennai Branch were stored in normal environment in closed almirahs/boxes/racks. Due to absence of temperature and humidity control, most of them were reduced to a very brittle condition. We did not find on record any proposal sent by Chennai Branch to the ASI for requisite funds to stop further deterioration of estampages. Ten inscriptions and letters of ten estampages had been obliterated/damaged in Epigraphy Branch, Nagpur. We could not ascertain the cause of damage and the period during which this occurred.

5.12 Capacity Building and Research in the ASI

The ASI has laboratory facilities in the Science Branch, Dehradun and other field offices of Science Branch. Scientific analysis of excavated material was being carried out with the assistance of the Science Branch and various external institutions.

We observed cases of inordinate delay in getting the results of the dating samples taken from Banawali and Dholavira which were sent to Birbal Sahni Institute and Physical Research Laboratory and copper samples sent to IIT Kanpur. In Vadodara Circle, six samples from Junikaran excavation were sent for testing to Institute of Physics, Bhubaneswar in June 2005, and July 2006 but results were still awaited. Results of samples of Bones sent during August 2004, to Deccan College, Pune had not yet received.

Failure on the part of the ASI to acquire and use modern equipment and to develop a laboratory of its own for dating and analysis of the archeo-materials had adversely affected the capacity building and research activities of the ASI.

Recommendations 5.8: *The ASI needs to enhance the use of modern scientific technology, build capacity of its officials and establish an upgraded dating laboratory of its own.*

The Ministry agreed (May 2013) with the recommendation.

Thus the working of the ASI in executing its function of excavation was marked by the absence of policy and criteria for excavation. Further, delays in report writing and publishing of excavation works led to non achievement of the desired progress in exploration and excavation activities.

Case Study 7 : Harappan Sites

In 1947, the most important Harappan sites viz Harappa and Mohanjodaro which were the showpieces of the ASI's efforts in the previous two decades, were left behind in Pakistan. In first two decades after independence, the ASI concentrated its efforts in finding new Harappan sites leading to significant discoveries viz Lothal, Kalibangan and Ropar. Subsequent discoveries like Dholavira and Rakhigarhi helped further to appreciate the geographical spread of the civilisation and to bring to light its important facets. These sites are thus some of the most significant signposts of Indian history and archaeology.

During this audit we visited these sites of Harappan civilisation and found that almost all sites were improperly maintained for want of post-excavation maintenance protocol.

Table 5.3 Status of Excavation Reports

Site	Excavation Status	Status of excavation report
Dholavira, Gujarat	1989-93, 1994-95, 1996-2004 **Incomplete**	**Incomplete**
Rangpur, Gujarat	1935,1947, 1953-56 **Incomplete**	Completed for excavations done so far
Rakhigarhi, Haryana	1997-98 to 1999-2000 **Incomplete**	**Incomplete**
Ropar, Haryana	1953-54, 1954-55 2011-12 **Incomplete**	**Incomplete**
Sanghol,Punjab	1986-87 to 1990-91 **Incomplete**	**Incomplete**
Lothal, Gujarat	1955-62 **Incomplete**	Completed for excavation done so far
Kalibangan, Rajasthan	**1961-69 Incomplete**	Completed for excavation done so far

Apart from the incomplete excavation work, we found that the work done so far was also not conserved and displayed properly. For want of regular inspection, these sites were in a state of encroachment and decay.

Table 5.4 Status of Harappan sites and the antiquities found

Site	Status of the site	Status of antiquities found
Dholavira, Gujarat **Dholavira excavated site**	▪ Site was not fully fenced. ▪ Pottery pieces, beads, earthen bangles, circular buttons, precious stones were lying on the site and were progressively destroyed with visitors walking over it. ▪ A Copper factory and a bead factory found near the excavated site were both under unauthorised cultivation by local farmers. ▪ There were no guide facilities.	A Site Museum with an "Interpretation Cum Information Centre" with 61 photographs of antiquities and 295 objects had been kept. The remaining antiquities were stated to be with the excavation team in Delhi for Report writing work
Rangpur, Gujarat **Site covered with vegetation** **Buildings on the Site** **Archaeological remains on the Site**	The site was not surveyed, measured, demarcated and fenced. Though it was a protected site, the protection notice board, culture notice board were not found. Houses had been constructed on the site. The site was covered under vegetation. Local people were using a portion of the site for taking out soil to make pots and dig ditches.	Artifacts were not collected and kept under safe custody. There was no information available on the antiquities collected at the time of excavation

Site	Status of the site	Status of antiquities found
Rakhigarhi, Haryana Heaps of Cowdung and broken fence on the Site Cremation ground on the protected site	The fencing on the site was broken at several places. There were heaps of cow dung cakes on the site. The mound was used as a cremation ground and as public toilet. There were unauthorised constructions on the site	The excavated collections were kept with the ASI.
Ropar, Haryana Ropar excavated site Constructions around the Site	There were unauthorised constructions on the site and three sides of the mound were densely populated. There was no Cultural Notice Board explaining importance of the site. Part of Nalagarh Kothi on the mound was converted to be used as office, guest house and store by the ASI.	In 1992, a Site Museum was built to store antiquities. It was opened to public in 1998.

Site	Status of the site	Status of antiquities found
Sanghol, Punjab Unkempt excavated site at Sanghol	There was no proper fencing on the site and the site was used as a cremation ground and defecation by the villagers. There were unauthorised constructions on the site.	Excavated collections were kept with the ASI and the State Government
Lothal, Gujarat Excavated site, Lothal	The site was lying without any fencing or protection. Some stones from the walls had disintegrated. Brick walls were found damaged.	Excavated collections were kept at the Site Museum
Kalibangan, Rajasthan Excavated site, Kalibangan	The site had not been fully fenced. There were unauthorised constructions on the site. The Site was not developed and maintained properly.	Only 267 excavated collections were kept at the Site Museum. Rest of the Antiquities were taken to ASI, Delhi

Case Study 8 : Ashokan Rock Edicts



Ashokan Rock Edict at Udaegolam in Dharwad circle



Ashokan Rock Edict in Delhi

Brief History

King Ashoka was one of the greatest rulers in human history. After winning the Kalinga war in 261 BC, he underwent a complete change. For the rest of his life he decided to dedicate all his resources to propagate the message of Buddha throughout the world. Ashoka issued religious edicts carved on stones. Ashokan Edicts were significant for the message related to the teachings of Buddhism and also as some of the earliest known stone inscriptions in India. These were written in several languages and scripts, but most of those found in India were written in Prakrit language using the Brahmi script. The edicts were of two types, i.e. in-situ rock edicts and the pillar edicts. The rock edicts were further subdivided into two categories, the "major rock edicts" and the "minor rock edicts", based on their age. Minor rock edits were the earliest, followed by major rock edicts. Minor rock edicts were further divided in into rock edict I and rock edict II. Major rock edicts were discovered across India with 14 personal declarations by Ashoka. These rock and pillar edicts were put up at prominent places along the royal highways, trade routes and pilgrimage centres across the subcontinent to spread the message of peace and non violence.

Present Status

The ASI was protecting 12 Ashokan Rock Edicts through their different circles like Dharwad, Vadodara, Delhi, Dehradun etc. These rock edicts required special attention and care because these have to be retained in-situ and being large rocks exposed to weather needed proper conservation and cleaning. We noticed that ASI did not prepare and implement any policy specially designed for these more than 2000 years old rock edicts. A joint physical inspection of five[44] of these rock edicts revealed the following irregularities:

[44] Ashokan Rock Edict in Delhi circle, in Vadodara circle at Junagarh, Gujarat, in Dehradun circle at Kalsi and in Dharwad circle at Nittur and Udaegolam.

Missing Monument

As per the information furnished by the ASI HQ, Ranchi circle had 12 monuments including one Ashokan Rock Edict. However, the circle office intimated that there were only 11 monuments and there was no Ashokan Rock Edict. Neither the ASI HQ nor the Ranchi circle sorted out this discrepancy in the list of monuments.

Categorisation

Though it was clear that the Ashokan Rock Edicts were categorized into Major and Minor Rock Edicts, the ASI did not categorise the centrally protected Ashokan Rock Edicts into Major and Minor Rock Edicts. No information was available in the details of the rock edicts placed at the site on whether that was a major or minor rock edict.

Conservation

Joint physical inspection revealed that the ASI was not properly protecting and conserving these Ashokan Rock Edicts. One of the worst case of poor conservation was found at the Rock Edict at Udaegolam in Dharwad circle where to protect the rock, the big pillars were erected on the rock itself thus damaging the Rock Edict.

Similarly to save the rock edict from the adverse weather conditions, a big hall was constructed around the Rock Edict in Junagarh, Gujarat and a shelter of stone slab was constructed at Nittur in Dharwad Circle. However, it was noticed that rain water was coming on both the Rock Edicts and causing damage to these precious stones.



Stains due to water seepage at
Ashokan Rock Edict at Nittur, Dharwad

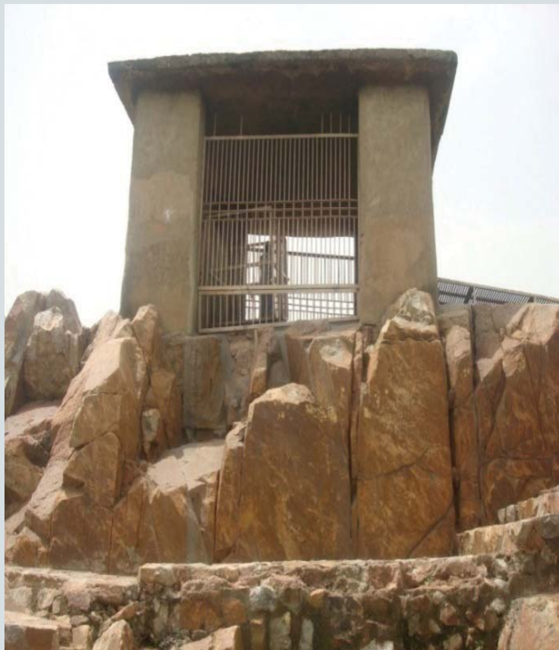


Stains on the inscription at
Ashoka Rock Edict at Junagarh, Gujarat

In Delhi[45], Rock Edict was covered with grill fencing. However it was noticed that visitors were not only touching the Edict but also performing rituals at the rock edict. It was also

[45] East of Kailash in Hauz Khas I sub circle

noticed that the garden surrounding the place was badly maintained and encroachment was noticed at the site. The signage installed in 2010 were found missing at the site.



Covered Ashokan Rock Edict in Delhi circle



Performance of rituals over the Rock Edict



Translation of the inscriptions at the Site



Missing signage at Ashokan Rock Edict

Ashokan Rock Edict at Delhi

In contrast, we noticed that Ashokan Rock Edict at Kalsi, Dehradun was properly maintained. It was covered with a gumbad which protected the rock edict and no visitors were allowed to touch the Rock Edict.



Ashokan Rock Edict at Kalsi, Dehradun

Translation of the Inscriptions

As these inscriptions were written in Prakrit language with Brahmi script, the ASI was expected to provide proper signages at the sites translating what was written on these Rock Edicts. Though all Ashokan Edicts had been deciphered and translated, no translation was provided at the site for the benefit of the visitors at these sites except in Delhi.



CHAPTER – VI

Management of Antiquities

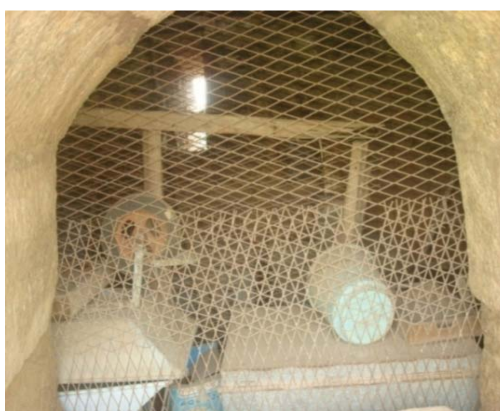
Antiquity includes any coin, sculpture, painting, epigraph or other work of art or craftsmanship; any article, object or thing detached from a building or cave which is of historical interest, or declared by the Central Government to be an antiquity which has been in existence for not less than one hundred years. This also includes any manuscript, record or other document which was of scientific, historical, literary or aesthetic value and which had not less than 75 years of existence[46].

The ASI is one of the largest repositories of antiquities in India. Besides, antiquities are acquired and maintained by various museums across the country. The ASI is responsible for the management, security and display of antiquities found during excavations. These are often displayed at the Site Museums. The ASI is also responsible for registration of antiquities possessed by private individuals and organisations. This includes efforts for restoration of stolen art objects.

6.1 Inadequacy of Policy and Legislation

6.1.1 Absence of Standards and Policy Guidance

The Ministry did not have a comprehensive policy for the management of antiquities. There were no standards for acquisition, preservation, documentation and custody of objects.



Trunks of Antiquities kept at Ghiyasuddin Tuglaq's Tomb , Delhi



Antiquities kept at Safdarjung Tomb

[46] Antiquities and Art Treasures (AAT) Act, 1972

There are several international standards available for managing antiquities in a museum issued by International Council of Museums (ICOM) and UNESCO. These standards and guidelines clearly define the methods of running a Museum, application of accession numbers, guidelines for disaster preparedness in museums etc. However, international best practices or standards were not adopted. In the absence of any standards, the decisions taken often lacked objectivity, uniformity and transparency as detailed in the succeeding paragraphs.

AAT Act provided registration of antiquities with individuals and private collections; however, the registration had not been made mandatory. This resulted in incomplete documentation and was also an impediment in retrieving stolen and lost antiquities.

6.1.2 Review of the AAT Act, 1972

We noticed that the ASI and the Ministry were conscious of the need for amendment in the AAT Act, 1972 since 1987. The Ministry started an exercise in 1997 to amend the Act. A draft cabinet note was also approved by the Cabinet in 2003. However, the amendment was still under process at the Ministry. Thus, the limitation of the legislation to curb illegal export and smuggling of art objects persists. The Ministry accorded no priority for this work and no timeframe was fixed for this purpose.

Recommendation 6.1: *The provisions of AAT Act and the International Conventions should be reviewed in order to make the legislation more contemporary and effective and to facilitate restoration of stolen art objects from other countries.*

The Ministry stated (May 2013) that the proposed amendments to the AAT Act, 1972 were under active consideration by the Ministry.

6.2 Acquisition, Registration and Documentation of Antiquities

6.2.1 Acquisition

Acquisition of antiquities is effected by the ASI and other museums through following modes:

(i) Collection of antiquities during survey, exploration and excavation of architectural sites;

(ii) Direct purchase;

(iii) By way of gifts;

(iv) By way of loan; and

(v) Compulsory acquisition of antiquities

The ASI acquired antiquities mostly through survey, exploration and archaeological excavations. The ASI established the Central Antiquity Collection (CAC) in 1960 for storing antiquities collected during surveys, explorations and excavations of archeological sites. Presently housed in Purana Qila, Delhi, CAC is a rich repository of explored and excavated pottery and antiquities collected from various parts of the country. We noted that the acquisition, documentation, storage conditions, physical verification and security of antiquities of CAC was grossly inadequate.

The artifacts of CAC were scattered and spread over four different locations. In the absence of appropriate documentation it was not possible to ascertain the location of specific artifacts.

The storage condition of antiquities kept at CAC, Purana Qila and Safdarjung Tomb were found deplorable as dipicted in photographs below:



Antiquities at Purana Qila in an improper condition



Antiquities at Safdarjung Tomb in an improper condition

6.2.2 Compulsory Acquisition of Antiquities

The ASI was empowered to compulsorily acquire antiquities but no antiquity had been compulsorily acquired till date. There were also no schemes of incentive for voluntary disclosure of antiquities.

6.2.3 Acquisition of Art Objects by Museums

The Museums acquired art objects mainly by way of purchase and gifts. No benchmarks or standards were followed for acquisition and valuation of artifacts. The Museums had not evolved a consistent policy for the acquisition and valuation of artifacts. As a result, decisions relating to acquisition were often arbitrary. We noticed that the Victoria Memorial Hall (VMH), Salar Jung Museum and National Museum did not purchase any artefact during the period covered under audit.

The acquisitions made by the Museums during the last five years were as follows:

Table 6.1: Acquisitions during last five years

Museum	Objects acquired	Remarks
National Museum (NM)	Nil	Art Purchase/Acquisition Committee was defunct since 1997
Asiatic Society, Kolkata (ASK)	29	Purchases were made through Art Purchase Committee which was formed every two years
Allahabad Museum (AM)	394	Absence of policy for acquisition
Salar Jung Museum (SJM)	Nil	Museum did not assess the requirement of art objects
Victoria Memorial Hall (VMH)	Nil	Non finalisation of Art Purchase Committee
Indian Museum (IM)	166	No standard system for purchases.

***Recommendations 6.2:** The Institutions should evolve a coherent acquisition policy for the acquisition of artifacts.*

The Ministry accepted (May 2013) the audit observation.

6.2.4 Paintings Received from VMH on Loan

Victoria Memorial Hall entered (December 2007) into an agreement with Rabindra Bharti Society (RBS), a registered society in West Bengal, for the acquisition of about 5000 painting.

We noted that out of 5000 paintings the status report of only 878 paintings had been completed till date (November 2012) and no conservation work was taken up so far. As a result, the intended objective of proper conservation of these paintings could not materialise.

6.2.5 Acquisition of Antiquities by Way of Gifts

The Museums accepted gifts and items for safe custody. We noticed that several Museums (namely NM, IM and ASK) did not have any policy for the acceptance or valuation of gifts. Even in the Site Museums there was no clear policy whether Site Museums could acquire antiquities and there was no benchmark for selection of items offered as gifts.

During the period of audit, National Museum, Delhi acquired 906 artifacts as gifts. Some instances of receipt of gifts by the National Museum are detailed below:

(i) The Indian Museum, Kolkata acquired the 'Kachhoa Sitar', 'tassar saree with maroon border decorated with floral design', and Dorakha red sujni or quilt embroidered with white thread with floral design' as gifts in 2010 and 2011 respectively. However, no records related to their authenticity were produced to us.

(ii) During scrutiny of records, we found that 10 Site Museums had acquired 7203 artifacts by way of gift/purchase/loan etc. without chemical/scientific verification.

The ASI stated (December 2012) that acquisition/ gifts did not cause any harm/irregularity. Even if the object did not happen to be an antiquity, it helped in site interpretation. It was not clear how such items without establishing that they were antiquities could be collected and displayed.

(iii) The collections of CAC included 3979 antiquities confiscated and seized by CBI, Custom and Directorate of Revenue Intelligence. No action was taken to return these antiquities to their original places or to place them in appropriate Museums.

***Recommendations 6.3:** The Museums should develop a mechanism for safekeeping of gifted artifacts and devise a policy for the acceptance of gifts after establishing their antiquity status and their display at appropriate sites or museums.*

The Ministry accepted (May 2013) the audit observation for compliance.

6.3 Registration of Antiquities

The AAT Act, 1972 provided that the Central Government may, specify those antiquities which should be registered under the Act. As per the extant provisions, registration of the artifacts was not mandatory. The Act further provided that the Central Government may appoint Registering Officers for the purpose of the Act.

As per the National Mission for Monument and Antiquities, the country had approximately 70 lakh antiquities.

There were no targets and no timeframe for completion of this work. There was no monitoring of progress of work by either the ASI or the Ministry. Further, the registration process was not based on scientific testing but relied on the naked eye. Hence, its accuracy could be contested.

***Recommendation 6.4:** The Ministry should expedite the work of registering antiquities and devise procedures for ensuring the genuineness of the registered antiquities in a time bound manner. Electronic format may be considered for the purpose.*

The Ministry stated (May 2013) that till date 4.8 lakh antiquities had been registered and no targets and time frame to complete the registration process could be fixed, as every year more objects fall in the category of antiquity. The reply is not acceptable as targets and time frame can be fixed based on the estimation or in absolute numbers of antiquities to be registered every year.

6.4 Evaluation of Acquired Objects

We observed that the IM, NM and ASK did not have a system in place for evaluation of acquired objects to verify the genuineness of the artifacts acquired/possessed by the Museums. We could not therefore derive any assurance on the authenticity of the artifacts in the Museums. Indian Museum acquired a silver coin which after evaluation was found to be a copper coin.



Before treatment (silver) **After treatment (copper)**

Best Practice:

Chhatrapati Shivaji Maharaj Vastu Sangrahalaya (CSMVS) was in receipt of objects/artifacts as gift. The Museum had a process for verifying the genuineness of the objects/ artifacts. The objects were initially examined by a Curator and thereafter placed before exhibit evaluation committee consisting of experts in the field and finally approved by a board of Trustees.

***Recommendations 6.5**: The Museums should evolve a policy for evaluation of the genuineness of the art objects.*

The Ministry accepted (May 2013) the audit observation.

6.5 Inventory and Grading of Art Objects

6.5.1 Accession of Art Objects

All antiquities in Museums should be properly accounted for as soon as received. Each antiquity has a separate unique accession number which also indicates the year of accession. Proper and regular maintenance of the accession register is essential for the safety and security of the Museum objects.

We, however, noted that there was no prescribed procedure in respect of the maintenance of accession registers. As a result, Museums were adopting different methods for accessioning of artifacts as can be seen in the **Annex- 6.1**

6.6 Discrepancies in Number of Antiquities

We observed significant discrepancies in the number of antiquities possessed by the Indian Museum and National Museum, which are detailed below:

Table 6.2 Discrepancies in the number of artifacts in Indian Museum

Artifacts as per Museum's reply	Artifacts as per database of Museum	Artifacts as per accession registers
107308	114271	94462

Table 6.3 Discrepancy in the number of artifacts in National Museum

Information provided in April 1999 to Expert committee	Information provided in September 2003 to Expert Committee	As per physical report of Expert committee in 2004	Information furnished to Audit in July 2011	Information furnished to Audit in September 2012
205375	**206121**	**206713**	**206212**	**205981**

Similar discrepancy was noticed in the case of Asiatic Society, Kolkata with regard to the gold coins possessed by it.

6.7 Physical Verification of the Artifacts

Periodical Physical verification of artifacts was essential to ensure the existence and also to assess the condition of the antiquities. The status of physical verification of artifacts in various Museums was poor as detailed in **Annex-6.2**.

6.8 Conservation of Antiquities

Preservation and conservation of artifacts was one of the primary objectives of Museums. There were many shortcomings in this activity, as noted from the following cases:

In the **Indian Museum, Kolkata** the Gandhara Stupa had been deteriorating for many years but was noticed by the Archaeology section only in 2008. However, no action was taken to conserve the Stupa. Absence of a policy for conservation and restoration resulted in the deterioration of the artifacts.

A mobile conservation laboratory acquired by the Museum in 1998-99 at a cost of ₹ 7.37 lakh largely remained unutilised.

The **National Museum, Delhi** had a conservation laboratory having qualified chemists. The Museum also conserved the items of several small Museums such as in the Rashtrapati Bhawan and Parliament House. After the setting up of the National Research Laboratory for conservation at Lucknow, the laboratory at the Museum stopped activities of conservation research. We noted that the laboratory was conserving only about 0.25 *per cent* of the total antiquities of the Museum annually. During 2007-12, only 2272 objects out of 2.06 lakh objects were treated and conserved by the laboratory.




Objects from the Aurel Stein collection lying in the conservation lab for the last 45 years

We noted that in the **Asiatic Society, Kolkata** nearly 40 *per cent* of the manuscripts were in poor condition and needed immediate conservation. In most cases, the objects received for conservation were already damaged beyond restoration.

Restoration of oil paintings at Asiatic Society, Kolkata

The Conservation laboratory in Asiatic Society was engaged in the restoration of mainly rare books and manuscripts. The Asiatic Society, Kolkata had 78 oil paintings. In 2005-06 the work of restoration of these paintings was awarded to a NOIDA based agency. The agency which was selected arbitrarily proposed to restore 60 paintings in ten phases (6 in each phase). However, only 26 paintings were restored till June 2012.

At the **Allahabad Museum, Allahabad** conservation work ranging from 1.80 *per cent* to 23.54 *per cent* was undertaken in respect of items received for conservation

At the **Salar Jung Museum, Hyderabad** 136 Indian Modern paintings retained in the store room since September 2008 and were not properly preserved, the dust had accumulated over them exposing them to possible damage.

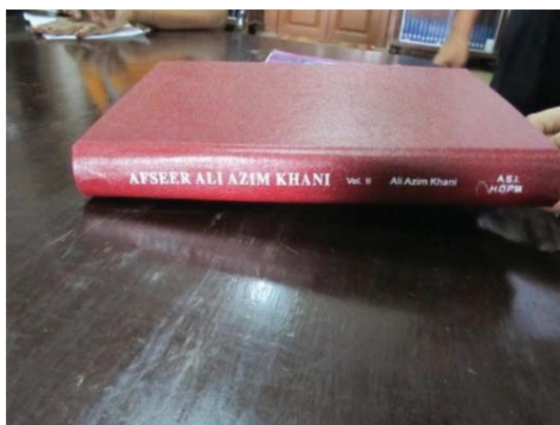
The Museum in its reply stated (August 2012) that the paintings were kept in this condition as the space was insufficient and overcrowding would destabilise the compactors. The fact remains that the paintings required immediate coverage and hanging in convenient compactors to ensure their proper preservation.

Best Practice:

The Chhatrapati Shivaji Maharaj Vastu Sangrahalaya conducts regular surveys for carrying out conservation work in respect of all the objects in possession of the Museum. These surveys were repeated by rotation. The artifacts were categorised as per their condition and prioritised for treatment. The conservation centre object register chronologically laid out the sequence of receipt and return of objects for treatment.

The **Site Museums** did not have a conservation wing for the restoration and conservation of antiquities. The Museums had not prepared any plan to periodically ascertain the condition of the artifacts kept in the galleries and reserves.

Out of the 179 paintings displayed in the gallery of **Hazarduari Palace Museum (HDPM), Kolkata** Circle, 55 paintings were in a damaged condition. 302 paintings out of 318 kept in reserve were also damaged and 30 paintings needed immediate conservation/restoration. In HDPM out of 77 Arabic manuscripts, 36 were severely damaged and 760 Persian manuscripts were also in poor condition. Binding work done by HDMP on manuscripts had caused further deterioration.





Condition of Manuscripts at Hazarduari Palace Museum

Recommendations 6.6*: The Museums should develop appropriate mechanisms to identify art objects requiring restoration/conservation and draw up a time schedule for their restoration.*

6.9 Research and Development

Research is one of the major functions of the Museums, through which useful information about materials and objects in the Museum collection can be generated for various stake holders.

Best Practices abroad: Victoria and Albert Museum, London

The Museum shares its experience with colleagues around the world and has also benefitted from many collaborations with external institutions. It also provides training and development within conservation and conservation science through internships and work placements. International and National collaboration projects are also undertaken on a regular basis.

The British Museum

The Museum carries out conservation research, scientific research over extended periods and in collaboration both with colleagues from other Museum departments and with other institutions. Interdisciplinary study involving the collaborative efforts of curators, conservators and scientists is taken up to take on new challenges and to find solutions.

The Indian Museum, National Museum and Asiatic Society did not undertake any research work. Further, VMH did only conservation research[47] and did not undertake scientific research.[48]

We observed that the Indian Museum, VMH and Asiatic Society did not have sophisticated instrument and technologies to carry-out research and development for scientific conservation. No training on the current techniques/process in the field of conservation/restoration was imparted in the Museums.

6.10 Digitisation and Documentation of Art Objects

6.10.1 Status of Documentation in the ASI

In the ASI, there was no documentation of antiquities taken away from the country before 1947 and hence, such antiquities could not be retrieved. Further, we noted several cases of art objects taken out of the country before implementation of the AAT Act, 1972 which could not be retrieved due to the absence of documentation.

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[47] Conservation Research includes the study of the deterioration of artifacts or the materials they are made from.

[48] Scientific Research focuses on manufacturing technologies and the different types of materials used to make the objects in the collection

Loaned Antiquities of Stein Collection in V&A Museum, UK

The collection of Aurel Stein is perhaps the biggest collection of Central Asian art including Chinese, Tibetan and Tangut manuscripts, paintings, textile fragments, ceramic, Buddhist art objects, Prakrit wooden tablets, thousands of other art objects and documents. Presently this collection was located at the National Museum, New Delhi, Indian Museum, Kolkata and Srinagar Museum in India. A part of this collection consisting of 700 objects was loaned to V&A Museum, UK by the ASI between 1923 and 1933. As per records, these antiquities were still "owned by Archaeological Survey of India" and were on loan. However, we did not find evidence of any efforts by the ASI to retrieve them.

Nazrana Gold Coins

After the merger of Hyderabad State, the Nizam of Hyderabad was allowed to retain some jewellery and such other items for his personal use under an agreement signed between him and the Union of India in 1950. Two giant "Nazrana gold mohur coins" pertaining to the erstwhile Nizam of Hyderabad were illegally taken away by his heir and pledged as security in 1988 with the Indo Suez Bank of Geneva for a loan of USD 60 lakh. These did not figure in the list of items allowed to be retained with the Nizam, nor were they declared by Shri Mukaram Jah on his succession as heir. In the absence of proper documentation on ownership of the coins, the ASI could not get the coins restituted. The coins are presently under the custody of Indo Suez bank Geneva.

The ASI stated (October 2012) that the restitution of the objects which were taken out of the country prior to enforcement of the Act were not within its control. Hence they had to depend on the goodwill of other countries for their restitution.

6.10.2 Lack of Database on Antiquities

The ASI collected and stored antiquities in Sculpture Sheds, Circles, stores, Excavation Branches and 44 Site Museums.

We noticed that as in the case of protected monuments, the ASI was not aware of the total number of antiquities in its possession as no database or inventory of antiquities had been prepared by the ASI. Branch wise lists were also not available with the antiquity Branch at the ASI HQ. In the absence of any centralised information, there was a high risk of loss of antiquities.

The Ministry stated (May 2013) that the centralised data of antiquities would follow only after the completion of digitisation process which is underway.

Recommendation 6.7: *The ASI should develop a centralised and digitised data base of antiquities to document all details of antiquities stored at different locations.*

6.10.3 Status of Documentation in the Museums

We observed poor documentation and digitisation of art objects in the Museums rendering them vulnerable to loss/theft.

We noted that the photography unit of the **National Museum** was to maintain photograph of each art object. However, the Museum had 175409 photographs out of 205981 documented as art objects.

Out of 205981 artifacts, the Museum had digitised only 2769 manuscripts and 2089 (AA category[49]) objects.

The **ASK** had several rare ancient and contemporary manuscripts but out of 50543 manuscripts, only 2467 manuscripts were digitised till March 2012.

6.10.4 Constraints Reported by the Museums in the Process of Digitisation

- The **ASK** stopped the digitisation work of rare books in 2009 stating that the books were damaged in the process of digitisation.
- The **Salar Jung Museum** stated that it was able to digitise only 4.15 *per cent* art objects, 59 *per cent* library books and 5 *per cent* manuscripts till August 2012 due to non-availability of colour scanners.
- The **Indian Museum** did not adopt any policy/procedure for digitisation of art objects. The Museum had no action plan to complete this activity.
- At **VMH** out of 28394 objects, 23415 in-house photo-documentation and digitisation was completed. Electronic database software Virtual Museum Builder JATAN, which was installed to exhibit details of the objects online with photographs, was unable to capture photograph in the database. Till January 2013 entry of 11368 objects had been done without the photographs.

Audit noted that except for Museums at Nalanda (Patna Circle), Bodhgaya (Patna Circle), Lothal (Vadodara Circle), Halebidu (Bengaluru Circle), Hampi (Bengaluru Circle) and Khajuraho (Bhopal Circle) this work was not completed.

In **Fort Museum (Chennai Circle)**, as per the accession register 4111 antiquities were registered; against the 3661 actual available antiquities.

[49] Rarest of the rare master pieces of artifacts, one of its kind, not fit for transportation owing to fragility etc and digitised on CD format.

In reply (December 2012), the ASI agreed stating that detailed documentation was lacking for which necessary steps had been taken.

6.11 Stolen and Seized Antiquities

During joint physical inspections, we found that 131 antiquities were stolen from monuments/sites and 37 antiquities from Site Museums from 1981 to 2012. We also found that two Buddha statues and one Garuda statue from Patna Circle were lying with Araria Police Station since 2005. Similarly four antiquities of the Indian War Memorial Musuem,Red Fort Delhi were with the Daryaganj Police Station since 1989.

The ASI informed that FIRs had been lodged for all missing antiquities. Immediately after report of theft of an antiquity, look out notices were also issued to all the enforcing agencies, custom exit channels and CBI-Interpol. However, we observed that in similar situations, worldwide, organisations took many more effective steps including checking of catalogues of international auction house, posting news of such theft on websites, posting information about theft in the International Art Loss Registry, sending photographs of stolen objects electronically to dealers and auction houses and intimate scholars in the field.

We found that the ASI had never participated or collected information on Indian antiquities put on sale at well known international auction houses viz. Sotheby's, Christie's, etc. as there was no explicit provision in the AAT Act, 1972 for doing so. We noticed several examples of antiquities of national importance being sold and displayed abroad. (Idol of Saraswati pertaining to King Bhoj is in British Museum, London).

Many countries had started aggressive campaigns to recover their treasures. Italy, Greece, China etc. had made initiatives in this regard. The Ministry did not have strategy for such proactive action.

As part of its responsibilities, the ASI was also a nodal agency to retrieve stolen or illegally exported art objects. From 1976 to 2001, 19 antiquities had been retrieved by the ASI from foreign countries either through legal means, indemnity agreement, voluntary action or through out of case settlement. But after 2001, the ASI had not been able to achieve any success.

Recommendation 6.8: *There is a need for a more concerted approach for retrieval of Indian art objects stolen or illegally exported to other countries. The ASI, as the nodal agency for this purpose needs to be more proactive and vigilant in its efforts and the Ministry needs to develop an aggressive strategy for the same.*

The Ministry stated (May 2013) that whenever any antiquity surfaces abroad ASI makes efforts for its retrieval.

6.11.1 Seized Antiquities and Court Cases

The ASI was empowered to give an opinion as to whether the seized antiquity was authentic. We noted that this function was characterised by delays and inefficiencies.

i. In June 1994, Dr. VJA Flynn, an Australian citizen, was intercepted by Customs authorities at Delhi with antique coins. Due to inordinate delay in photography by the ASI, even after a lapse of 18 years the case was still sub-judice. The ASI was also facing a defamation suit from Dr. Flynn claiming damages of US $ 11,00,000. The ASI stated (October 2012) that the delay was "procedural".

ii. Delhi Circle of the ASI, made a surprise check (November 2010) of an auction held at ITC Sheraton Hotel, New Delhi and declared four paintings of Raja Ravi Varma, brought for auction, as antiquities. These paintings had been declared as Art Treasure[50] under the AAT Act, 1972 by a gazette notification in 1979. The matter went to Court through a descendant of Raja Ravi Varma. The Court, sought information on the registration of the paintings, which the ASI failed to provide to the court.

In December 2012, the ASI was yet to decide whether these were original works of Raja Ravi Varma and to declare the Art treasure as an Antiquity.

6.12 Export of Antiquities and their shifting for Exhibitions Abroad

6.12.1 Grant of Non Antiquity Certificate

Every Circle through an Expert Advisory Committee[51] headed by Superintending Archaeologist issued Non Antiquity Certificate (NAC) to objects meant for export. The Appellate Committee headed by the DG ASI decides on applications that disputed the action of the Expert Advisory Committee.

We noted that in the ASI circles, this certificate was given without any fee after mere inspection of the object without stamping to avoid tampering before export. Besides, the ASI did not maintain any centralised information on grant of these certificates.

In the absence of these controls, the entire procedure for the grant of the non-antiquity certificate was completely open to the risk of malpractice.

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50 An Art Treasure means any human work of art, not being antiquity, declared by Central Government by notification in the official gazette, to be an art treasure for the purpose of the Act having regard to its artistic or aesthetic value, provided no such declaration can be made in respect of any such work or art so long as the author was alive.

51 With outside experts

In 2003 two art objects were declared as antiquity by the "expert committee". When challenged in court, the objects were re-examined by another expert committee, which concluded that only one out of two objects was an antiquity. This case highlighted the need for undertaking detailed tests before grant of non antiquity certificates.

6.12.2 Exposition of Buddhist Relics to Bhutan

Without permission from the Ministry of Culture, the ASI issued Temporary Export Permit for exhibition of antiquities abroad. We noticed that in violation of the guidelines the ASI sent three Buddhist relics to Bhutan in 2011.

In their reply the ASI stated (October 2012) that the proposal was not placed before the Inter Ministerial Committee as its meeting was held before receiving the proposal.

6.12.3 Non- signing of Conventions

We found that in 1977, India had ratified the Convention on the means of Prohibiting and Preventing Illicit Export, Import and Transfer of Ownership of Cultural Property, Paris, 1970. Subsequently, no other multilateral or bilateral instrument had been signed or ratified to facilitate restoration of stolen art objects.

Recommendation 6.9: *The Ministry should frame a comprehensive policy for Management of Antiquities owned by the Organisation.*

The Ministry stated (May 2013) that ASI would work towards achieving comprehensive policy on Antiquities.

6.13 Site Museums of the ASI

According to the International Council of Museums, a Museum is a non-profit making permanent institution in the service of society and of its development, open to the public, which acquired, conserved, researched, communicated and exhibited, for purposes of study, education and enjoyment, the tangible and intangible evidence of people and their environment.

The Sarnath Museum, established in 1904, was the first museum in India.

In Site Museums archeological/historical material specific to the region were displayed in close proximity to the site. These were mostly located inside monument or adjacent to the excavated sites while other Museums were separate entities.

As on March 2012, the ASI had 44 Site Museums. We found following deficiencies in the establishment, maintenance and development of the Site Museums.

6.13.1 Criteria for Establishing Site Museums

The Site Museums were managed by a Director (Museum) at DG ASI. We noted that the re-organisation of Site Museums had been made five times; in 1960, 1977, 1998, 2010, 2012 for achieving growth and development. The ASI Site Museums were set up as per approval of the competent authority through inspection by an Archaeological Officer (ASA or above). No other guideline was available. Accepting the factual position, the Ministry stated that the ASI would need to frame a perspective plan and policy in regard to the functioning and establishment of its Site Museums over the next few years.

Recommendation 6.10: *The ASI needs to develop detailed guidelines for the functioning and establishment of site museums.*

6.13.2 Opening New Site Museum

i. No new Site Museum had been opened after 2006, and there was no action plan /target for opening new Site Museums. Shortage of funds and human resource (December 2012) was attributed for not opening new Site Museums. Archaeological Museum, Dholavira, Gujarat was the last Site Museum opened in 2006 after a Parliamentary assurance. However, excavated antiquities had not been handed over to this Museum so far (December 2012) defeating the very purpose of establishing the Museum. The ASI stated (December 2012) that report writing on Dholavira excavation was in progress and the selected antiquities could be shifted to the Museum only after completion of the report. However, no time frame was indicated in the reply.

ii. The Sub Committee of the Central Advisory Board of Archaeology (CABA) for Antiquities and Museums recommended for opening of Site Museum in places having valuable collection of archaeological material like Patan (Gujarat), Deoghar (MP), Banawali (Haryana) Rakhigarhi (Haryana) Chandraketugarh (West Bengal). However, no progress was reported till December 2012.

iii. Proposals for opening Site Museum at Piprawaha (UP) and Shivpuri (MP) were under process since 2009 but the Site Museums had not yet been opened. The ASI stated (December 2012) that the State Governments had constructed the buildings in low lying water stagnated area and this was a major hindrance to shift the valuable antiquities in the buildings. The matter had been taken up with the State Governments for remedial action.

iv. Lalitgiri, Odisha was the only site in Odisha in which the Buddhist relics were found in a fourfold casket, in the excavations conducted from 1985 to 1992. The ASI had proposed to set up a Site Museum at Lalitgiri to house the Buddhist relics in 2007. However, the Site Museum was yet (December 2012) to come up and the building plan was still under finalisation .

v. The Speaker, Assam Legislative Assembly during his visit to the site of Masonry Remains on the Bamuni Hills in 1998 suggested setting up a Site Museum in an unfinished building close to the site. We noticed that ₹ 33.11 lakh were paid towards the cost of the acquisition of the land and building during February 2001 to 2003 and further ₹ 29.13 lakh was incurred for the development of the building during 2007-08 to 2011-12. However, the Site Museum had not yet been established.

vi. In July 2000, it was decided to establish a Site Museum at Fatehpur Sikri. The Site Museum had not been opened (December 2012) despite incurring an expenditure of ₹ 63.24 lakh.

vii. In Lucknow Circle, a large room was constructed in 2002-03 for ₹ 4.91 lakh for locating a Site Museum but it was not established till date (November 2012).

6.13.3 Failure to Convert Sculpture Sheds as Site Museums

The Site Museums are purposely created, to place antiquities in juxtaposition to the excavated site so as to retain the archeological context.

In 2009, the Sub Committee of the Central Advisory Board of Archeology, recommended to convert more than 35 sculpture sheds[52] and 38 other sites with valuable antiquities in Site Museums. We could not find any progress in this regard.

During site visits, we also noticed cases of under-utilisation of Sculpture Sheds as antiquities were not stored in them thus defeating the very purpose of construction of Sculpture Sheds. We found that antiquities were scattered at Site/Circles/Sculpture Sheds and the ASI had failed to develop site museums as detailed below:

i) In the Kolkata Circle, a Sculpture Shed was constructed at Rabdentse Site in Sikkim in the year 2003-04 with a view to display the objects found at the Rabdentse Site. The Circle also incurred an expenditure of ₹ 8.31 lakh in 2009-10 for strengthening and enlarging the display area of the Sculpture Shed. However, during site visits, we

[52] Sculpture Shed is a place where the archeological remains belonging to the site and the adjoining area are kept in safe custody, under a shed

noticed that 12 glass boxes fixed to the wall in the Sculpture Shed were empty and only 69 sculptures and 48 other items were displayed in the shed without any accession number. Some antiquities found in Rabdentse Site were kept in plastic bag inside the office of the ASI, Sikkim Sub Circle, Geyzing without accessioning.



Sculpture Shed at Rabdentse Site, Kolkata Circle with empty glass boxes and antiquities kept below

Empty Sculpture Shed at Bangarh, West Bengal

A sculpture shed was constructed at Bangarh Site in 2009-10 at a cost of ₹ 5.71 lakh . However, this was lying unused, as only one stone sculpture found from a nearby village, two wooden pieces and some terracotta tiles found from Bangarh excavation were kept in the sculpture shed, without accessioning[53]. The remaining items, out of total 1246 antiquities found from Bangarh excavation, were kept in Circle Office, Kolkata.

Recommendation 6.11: *The ASI should take early action to utilise the above Sculpture Sheds and develop Museums at Sites.*

6.13.4 Status of Antiquities

The ASI was required to preserve, protect and disseminate all forms of art, culture and objects of historical importance for identification of a particular culture, socio economic history. However, we found that the antiquities were kept in Circle Offices, Excavation Branches, Monuments/Sites as below. These antiquities were not displayed properly:

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53 Documentation of antiquities in the prescribed format

Table 6.4 Status of the Antiquities

Sl. No.	Place where kept	Number of antiquities
1.	Chennai Circle Office	395 antiquities recovered from the excavation conducted in Adhichanallur, Siruthavur and Malaiyadipatti.
2.	Store Room of Bhopal Circle	3486 sculptures of 6 sub circles of Bhopal Circle (Burhanpur, Jabalpur, Raisen, Rewa, Sagar and Sanchi) were lying in store.
3.	Store Room of Jaipur Circle and Monument Sites	10265 antiquities of monument site and 2881 antiquities of excavated sites were dumped in store rooms.
4.	Excavation Branch, Nagpur	2949 antiquities from excavations done during 2007-09 to 2011-12 were stored.
5.	Vadodara Circle	Over 2000 uninventoried antiquities were dumped in four cupboards.
		228 iron cannon balls had been dumped in the store of Diu Fort, Diu. 2160 cannon balls(left by Portuguese while leaving the Fort) were lying scattered in the compound/garden area, these were not inventoried even
		Over 100 sculptures were kept in a store room in Sub Circle Office(Patan) of Vadodara Circle
		300 sculptures were kept in a shed near sub circle, Patan
6.	Bhubaneswar Circle	5915 antiquities had been stored in the store room by Excavation Branch
7.	Srinagar Circle	2724 artifacts were dumped in the office premises for last one to 42 years. There was no Site Museum in the Circle. An unearthed sculpture belonging to the ancient temple, Fatehgarh was stored in a private rented room.
8.	Chandigarh Circle	1028 antiquities and 70 silver coins were dumped in the office premises
9.	Patna Circle	973 antiquities found from excavation of 1978 and 1989 were dumped in Patna Circle Office
10.	Jaipur Circle	In 16 monuments, **(Details in Annex 6.3)** antiquities like old carving stones, pillars, statues, sculptures were lying scattered
11.	Hyderabad Circle	Undocumented loose sculptures were found lying in the monuments
12.	Bengaluru Circle	Excavated sculptures and antiquities were found scattered in the excavated site opposite the Hoysaleshwara temple, Halebedu, and also in the Hoysaleshwara temple compound. These were not inventoried.

The ASI thus failed to develop Sculpture sheds and Site Museums in several cases. This was fraught with the risk of loss/deterioration of the priceless antiquities.

Recommendation 6.12: *The ASI needs to carry out physical verification of antiquities lying at different sites/stores/circles/sub circles to ensure that each one of them is properly documented, numbered, and recorded. They need to be placed in sculpture sheds, site museum or may other suitable location.*

The Ministry stated (May 2013) that physical verification was being done based on existing accession register.

6.13.5 Fourteen Points Reform and Upgradation of Site Museums

The Ministry of Culture issued 14 points museum reforms/guidelines in October 2009 for Upgradation of security, public awareness, visitor facility and modernisation of all the Site Museums. However, these had not been fully implemented in all the 44 Site Museums.

The Ministry stated (May 2013) that the Ministry was monitoring the implementation of these reforms and had issued instructions to all officers in charge of various Museums to implement the museum reforms in their true letter and spirit. The fact remains that the work has not been completed till now.

6.14 Display and Maintenance of Art Objects

6.14.1 Rotation Policy

Art objects displayed in the Museum depict rich and diverse heritage of our nation. Given the space constraints, all Museums in the world devise policy for periodic rotation of display items. We noted that the Museums selected for audit did not evolve a rotation policy for displaying artifacts. The display details of the Museums are given below.

Table 6.5 Details of the display and reserve of artifacts

Name of the section	No. of objects possessed till date	No. of objects displayed	No of objects in reserve	Percentage of the total objects in reserve
National Museum	205981	7333	198252	96.24
Indian Museum	107308	1862	105446	98.26
Victoria Memorial Hall	33493	1625	31768	95.13
ASK	54655	79	54576	99.85

It would be evident that more than 95 *per cent* of objects were lying in reserve in the above Museums. This resulted in the non- display of large number of art objects and the museums were not able to showcase their valuable antiquities.

6.14.2 Site Museums

We noticed that none of the Site Museums had any rotation policy for displaying the objects to facilitate the public viewing of reserve antiquities. In 11 Site Museums[54], more than *90 per cent* of the antiquities were kept in reserve. The ASI stated (December 2012) that there was no unified policy document in Site Museums.

6.14.3 Status of Galleries of Various Museums

We noted that all the galleries were not open for public due to some reason or the other like refurbishment of gallery, seepage etc. The galleries closed for public were as follows:

Table 6.6 Status of closed galleries

Name of Museum	Total number of galleries	Number of galleries closed	Remarks
National Museum, Delhi	26	7	Period ranging from one to nine years
Indian Museum, Kolkata	29	8	Out of the 21 open galleries, rotation was not done during the period ranging 2 to 23 years in eight galleries
Victoria Memorial Hall, Kolkata	12	2	In seven galleries, artifacts were not changed since inception.

[54] Kondapur and Nagarjunakonda, (Hyderabad Circle), Nalanda and Sarnath (Patna Circle), Red Fort (Delhi Circle), Sheikh Chilli's Tomb (Chandigarh Circle), Tipu Sultan Museum (Bengaluru Circle), Khajuraho and Sanchi (Bhopal Circle), Ratnagiri (Bhubaneswar Circle) and Kalibangan (Jaipur Circle)

6.14.4 Status of Storage of Art Objects in Different Museums is shown in the following Photographs:



Objects lying in the basement of the National Museum along with other items



Dust gathering over priceless statues in the basement of National Museum



Store Rooms of Victoria Memorial Hall

At Benisagar site, Ranchi we found that antiquities were kept in the staff quarters.



Antiquities found in staff quarters at Benisagar

6.14.5 Storage of Antiquities/conditions of Reserve Items in Site Museums, CAC and Data Bank of the ASI

Proper storage facilities with effective air conditioning and adequate air circulation are essential in order to avoid deterioration of artifacts. We noticed that the reserve collection of Ropar Museum (Punjab Circle) and Fort Museum (Chennai Circle) was not stored in proper condition. Sculptures were lying on the backyard of Aihole Musuem (Dharwad Circle) Chanderi Musuem (Bhopal Circle), Sarnath (Patna Circle) and Nalanda Museum (Patna Circle).

In the Central Antiquity Collection (CAC), there was no facility of maintaining air conditioned environment for the antiquities. We noticed problems of peeling plasters, dampness and seepage aggravating the deterioration of artifacts stored in various cells of Purana Qila, Delhi.

During physical inspection of the Data Bank by audit in June 2012, we noticed that while shifting from Purana Qila to Red Fort, 60 cabinets out of 120, containing valuable records (original registration certificates) of the Data Bank were severely damaged. In the absence of proper space, another 66 cabinets were kept open in the gallery, exposed to heat, air and dust which deteriorated the records beyond recovery. The data bank was estimated to have 4.5 lakh records but during the digitisation work of the National Mission and Monument Authority, only 3.5 lakh records were produced as the rest were damaged by rodents.

6.15 Exhibitions and Insurance Claims

One of the most important functions of a museum was to exhibit its collection. 'Show less but show well' was an accepted slogan by most of the Museums so that the best pieces were exhibited.

Indian Museum organised Coins' exhibition in December 2009 in which 101 coins having historical value were displayed in the exhibition. We noted that these included two coins having pictures of Emperor Akbar which were declared as fake by the physical verification committee (February 2009). The action of the Indian Museum to display these fake coins was, therefore, inappropriate.



Pictures of Fake Coins

6.15.1 Exhibitions Organised Abroad

The Ministry decided to organise exhibitions in China and Korea during 2011 which were subsequently cancelled due to some reason or the other. The Ministry had not entered into any agreement with the respective governments.

For the exhibitions held abroad, the National Museum appointed a 'Fine Art Handling Agent' (FAHA) to handle the transportation, packing, handling, and fabrication of boxes etc. The objects sent abroad were covered by insurance. The following artifacts were found damaged/lost during the exhibitions held abroad:

- Loss of semi precious stone from the hands of Buddha in the Tierra sent to Korea (Buddhist Art Exhibition) in 2006 (insurance value of ₹ 50 lakhs),
- Abrasion on the right fingers and loss of nail tip of stone Sculpture,
- Huntress (insurance value of ₹ 12 crore) in the exhibition to Brussels (Passage to India) in 2010

We noted that the Museum failed to take adequate steps to recover compensation from FAHA in the light of agreement. We also noted that the same agency was being awarded the contract of future exhibition indicating undue favour to the firm. The National Museum stated (September 2012) that due care would be taken in all future exhibitions.

Recommendation 6.13: *The Museums should adopt a rotation policy for the display of artifacts. It should devise mechanism for proper and attractive display methods to attract visitors.*

Recommendation 6.14: *The reserve collection should also be properly maintained and preserved in suitable storing condition.*

The Ministry accepted (May 2013) the recommendation.

6.16 Modernisation of Metro Museums

In 2004-05, the Ministry started a scheme for modernisation of metro musuems in four metro cities. The scheme also covered National Museum, Indian Museum and CSMVS. An outlay of ₹ 100.00 crore was earmarked for National Museum and Indian Museum for the 11th Five Year Plan. The museums were required to submit detailed project report with the help of well reputed consultants. However even after a lapse of more than eight years, National Museum and Indian Museum failed to submit the same.

The Ministry released ₹ 15.43 crore to CSMVS, Mumbai between September 2008 to January 2013. However, it was noticed that the Ministry did not properly monitor the works carried out by the CSMVS. Irregularities like delay in completion of the project, multiple revisions in the estimates, absence of information in respect of the actual expenditure incurred on the project etc. were noticed.

CHAPTER – VII

Financial Management

Funding is crucial for the conservation activities of different organisations. The Ministry allocated funds under Plan and Non-plan component to the ASI. The funds were also released to the two subordinate offices i.e. the National Museum and NRLC[55] by the Ministry. The other Museums received grant-in-aid from the Ministry. The National Culture Fund, a trust of the Ministry, had been provided a corpus fund by the Ministry with the objective of encouraging participation of the corporate sector, NGOs, State Government, Private/public sector etc. The funding made by the Ministry to different institutions is discussed below.

7.1 Attached office-Archeological Survey of India

7.1.1 Budget Estimates and Expenditure

The financial position of the ASI depicting the budgetary estimates and expenditure incurred during the period of audit are given below in the table:

Table 7.1: Budget estimates and expenditure figures of the ASI

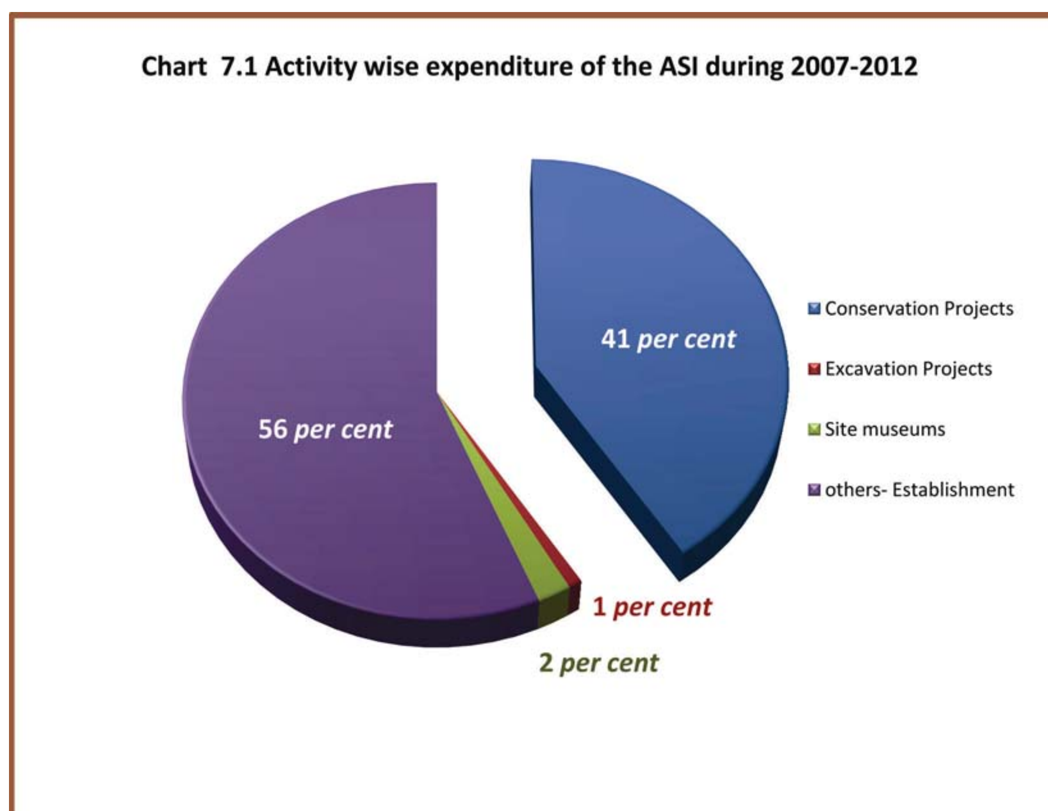
(₹ in crore)

Year	Budget estimates		Actual Expenditure	
	Plan	Non-plan	Plan	Non-plan
2007-08	98.00	185.50	90.88	185.87
2008-09	111.00	201.00	106.93	232.89
2009-10	111.00	268.70	126.31	286.39
2010-11	121.00	260.00	154.24	267.71
2011-12	152.00	287.00	171.58	275.26

Source: Outcome budget documents of the Ministry of Culture

[55] National Research Laboratory for Conservation of Cultural Property

The chart below depicts the activity-wise components of expenditure incurred by the ASI during the period 2007-12.



7.1.2 Inadequate Funding

The Ministry made budgetary allotments to the ASI without assessing their funds requirement and absorptive capacity. The requirement of funds should commensurate with the number of centrally protected monuments and the need for preservation and conservation of these monuments. The consequences of inadequate funding have been discussed in **Case Study No 2, Para 4.9.2 and also in Para 5.4.3.**

We noted that the Ministry had made significant reductions in the funds requirement projected by the ASI, as detailed in the table below.

Table 7.2: Plan budget proposed by the ASI and allotted by the Ministry

(₹ in crore)

Year	Projected requirement	Original Budget Allotted	Expenditure incurred
2007-08	174.05	98.00	90.88
2008-09	177.90	111.00	106.93
2009-10	176.41	111.00	126.31
2010-11	163.16	121.00	154.24
2011-12	268.94	152.00	171.58

Thus, the reduction in funds projected by the ASI ranged from 26 to 44 *per cent.* The Ministry did not provide the reasons for reducing the budget as proposed by the ASI. The excess of expenditure with reference to the original allotment ranged from 13 to 27 *per cent* especially during the last three years (2009-10 to 2011-12).

7.1.3 Budgeting and Funds Arrangement for Conservation

7.1.3.1 Preparation of Revised Conservation Programme (RCP)

Based on the inspection and assessment made by the officer in-charge of a monument, the annual funds requirement is submitted to the concerned Circle office. The consolidated funds requirement proposed to be used by a Circle office on conservation work is termed as Revised Conservation Programme (RCP). Thus, RCP is a tool to project Circle/Branch wise annual funds requirement for undertaking conservation works. Thereafter, the RCPs are required to be submitted to the ASI HQ for assessing the overall funds requirement for conservation works.

We, however, noticed that budgeting process in the ASI was inappropriate. The ASI, rather than receiving proposals in the form of RCPs from the Circles/ Branches, sought proposals based on the budgetary allocation figures circulated to the Circles/ Branches.

We also noticed that the Circles/ Branches did not exercise due diligence while assessing the funds requirements, as only in a few cases estimates were prepared to work out the funds requirement.

As a result, the ASI ignored the conservation needs of several valuable monuments due to paucity of funds. For example, in case of 110 Kos Minars the expenditure incurred during the last five years was only ₹ 38.33 lakh. On many other sites/monuments no money was spent despite dire need of conservation. Joint physical inspection revealed that many Kos Minars were in a dilapidated condition. **(Refer Case Study No 5).**

Besides, this also led to funds meant for conservation works being utilised on petty non-conservation works like raising of boundary walls, public amenities etc. in majority of cases. For example, Delhi Circle incurred ₹ 47.51 crore during the year 2010-11 and 2011-12 on special repair works. Out of this, works amounting to ₹ 7.66 crore were not directly related to conservation works.

Blocking of Funds- Badami, Bangalore Circle

In order to preserve the historical monuments and improve tourism, Revenue Department of Government of Karnataka approached (February 2003) the DG ASI with a proposal to acquire the unauthorised buildings around Badami, Bengaluru Circle. Accordingly, the ASI released (February 2006) ₹ 2.72 crore against the State Government's request for ₹ 3.32 crore. Further in November 2009, the State Government again requested the ASI to deposit an additional amount of ₹ 6.36 crore which was further enhanced (July 2012) to ₹ 12.53 crore. The State Government also stated that in case of non receipt of funds, the land acquisition proceedings would be dropped. Thereafter no follow-up was evident in the records of the ASI leading to blocking of fund of ₹ 2.72 crore for over six years.

7.1.4 Receipts of the ASI

Revenue generation is important for an organisation engaged in Conservation work. The world over organisations managing heritage conservation are engaged in enhancing revenue by way of sale of souvenirs at site, charges for guide services, special charges for special tours and sale of publications.

The main sources of revenue of the ASI were ticketing, sale of publication, organisation of cultural events and permission for film shooting etc. However, we noted deficiencies in efforts made by the ASI for augmenting revenue generation.

The ASI generated a total revenue of ₹ 422.46 crore during the period from 2007-08 to 2011-12. However, the PAOs intimated the receipt as ₹ 431.78 crore. The ASI neither explored the reasons for the discrepancy nor reconciled the figures with the PAOs. Further, we also noticed variation in revenue figures maintained at the Circles/ Sub-Circles with respect to that maintained at the ASI, HQ and PAO, ASI.

7.1.4.1 Ticketed Monuments of the ASI

As per the AMASR Rules 1959 (Rule 6), the ASI charged a prescribed entrance fee from visitors above the age of 15 years on visit to certain set of monuments. The details of entrance fee chargeable on various category of visitor are given below in the table.

Table 7.3 Rates of entry fees for citizens of different countries

(Amount in ₹)

	For Indian citizens and citizens of SAARC and BIMSTEC	For other foreign visitors
World Heritage Sites	10	250
Other protected monuments	5	100

We noted that out of the 3677 protected monuments under the control of the ASI, only 124 monuments were designated as ticketed as on February 2006. The number of ticketed monuments was further reduced to 116. The rates were last revised in the year 2001 and the last monument declared as ticketed was in the year 1998. The ASI is presently in the process of increasing the ticketing rates.

Sale of tickets

Revenue realised through sale of tickets in 116 protected monuments ranged from ₹ 66.25 crore to ₹ 95.64 crore during the period 2007-12. Analysis of the revenue figures revealed that more than 75 *percent* of the total revenue pertained to only 10 monuments*.

The ASI could not furnish justification or grounds on which the authority of ticketing on visitors was withdrawn from the eight protected monuments. However, the ASI without referring to specific cases pointed out by us informed (September 2012) that entry fees was withdrawn due to unavoidable circumstances such as customary religious practice in vogue etc.

We noticed that there were no specific criteria or guidelines for categorisation of a particular protected monument as ticketed, thus rendering the process of designating or withdrawing the status as arbitrary and ad-hoc.

There were some ticketed monuments like the S*ultan Garhi in Delhi* Circle and the *Baba Pyara caves in Vadodara Circle* from where the annual revenue received during the period of audit ranged between ₹ 1550 to ₹ 3161 and ₹ 855 to ₹ 7531 respectively. This indicated low visitor turnout. On the other hand, two centrally protected monuments in Srinagar Circle i.e., group of Arched Terraces/structural complex Parimahal Srinagar and Mughal Arcade were not declared ticketed by the ASI despite high visitor turnout, which was evident from the fact that the State Government had levied the entry ticket and parking charges and earned an amount of more than ₹ 42 lakhs during the year 2011-12. Similarly there were monuments like *Bara Imambara in Lucknow Circle* and *Thiksey, Shey and Alchi monasteries in Leh mini Circle* where the managing trusts levied entry tickets and collected money, though the ASI did not designate them as ticketed monuments.

* Taj Mahal, Agra Fort, Fatehpur Sikri, Agra, Red Fort, Qutb Minar, Humayun Tomb, Delhi, Group of Monuments, Mallapuram, Western Group of Temple, Khajuraho, Sun Temple, Konark and Excavated remains, Sarnath.

The ASI requested (2010) the Circle offices to submit their suggestions for inclusion of more monuments as ticketed. We noted that due to incomplete information submitted by the Circles, the ASI was not able to include more monuments in the 'ticketed' category.

"Buddhist rock-cut stupas, Dagabas and caves and the ruins of a structural Chaitya with its outbuilding and other Ancient remains on two adjoining hills known as Bojjanna Konda, Sankaram, Visakhapatnam District", a centrally protected monument in Hyderabad Circle, was not declared ticketed by the ASI, HQ. However, the Circle office printed the tickets in the year 2005 in anticipation of the approval from the HQ office. The monument was not declared as ticketed and the printed tickets could not be used by the Circle. DG, ASI took no action on the lapse on the part of Hyderabad authorities.

***Recommendation 7.1:** The ASI should frame clear norms and guidelines for designating a particular monument as ticketed, with a view to enhance the revenue realisation from sale of entry tickets.*

The Ministry (May 2013) intimated that the existing norm for introduction of entrance fee at the monument was the number of visitors the monument received every day. The ticket is not introduced at a monument, which does not have a considerable number of daily visitors/tourists, because the ASI is required to put in place complete infrastructure for ticketing irrespective of the number of visitors. The total expenditure on the creation of infrastructure and the entrance fee collected are given due consideration while introducing ticket at the monument.

The reply is not valid as the ASI did not have a reliable mechanism to assess the number of visitors to the monumentswhich are not ticketed.

7.1.4.2 Non Revision of Rates for Film Shooting

Rule 42 of the AMASR Rules, 1959 provided that each person intending to undertake any filming operation at a protected monument shall apply to DG, ASI for licence at least three months before the proposed date of the commencement of such operation. The DG may grant a license for film shooting on payment of a fee of ₹ 5000 in case of professional and other agencies. We noticed that agencies like Indian Railway charged ₹ 0.30 lakh to ₹ 1.0 lakh per day, Delhi Metro Rail Corporation charged ₹ 1.0 lakh per hour and Delhi International Airport Limited charged ₹ 5.0 lakh per four hours for film shooting in their premises. Even the agencies like CPWD and NDMC charged upto ₹ 0.50 lakh per day for film shootings in their areas. Thus the rates of the ASI were abysmally low in comparison to comparative rates.

We noted that these rates had not been revised since 1991. In Delhi Circle alone during the period of audit, 87 film shooting permissions were given and a revenue of ₹ 2.64 crore was realised.

The Ministry stated (May 2013) that the ASI had mooted the proposal for revision of the licence fee for filming at the monuments twice in the past, but the same was not approved.No reasons were accorded for non approval of proposed revisions.

Recommendation 7.2: *The ASI needs to revise the rates for film shooting and ticketing to make these a substantial source of revenue.*

7.1.4.3 Delay in Remittances of Government Money

As per Archaeological Works Code, all money received at monuments and sites as Departmental receipts was to be credited into the nearest local treasury or Bank on the next working day regularly through Treasury challans. The counter foils duly receipted by the Treasury Officer had to be submitted to the Head of the Office concerned at the close of each month. The amount was to be posted in the revenue register and passed through the Cash Book of the head of the Office concerned.

The money received by sale of tickets etc. were deposited by the counter clerk to the Sub Circle incharge who deposited the same to the Circle office through which it went to the government account in the accredited bank.

We noted that there were delays by every Circle in depositing the money into the Government account. Such delays ranged between two to four years.

Out of 44 Site Museums, entry fee by way of tickets was charged in 31 Museums. We noticed that in 14 Site Museums there were delays in depositing the money collected by 15 to 180 days.

In Hyderabad Circle, Demand Drafts amounting to ₹ seven lakh collected as security deposit for film shooting in monuments during 2005-12 were not credited into Government account till the end of audit.

7.2 Subordinate Offices

The Ministry had two subordinate offices i.e. National Museum and National Research Laboratory for Conservation of Cultural Property which are involved in preservation and conservation of monuments and antiquities.

7.2.1 Budget Estimates and Expenditure

The table below shows the budget estimates and expenditure incurred there against by the two subordinate offices during the period covered under Audit.

Table 7.4: Budget estimates and expenditure figures of Subordinate Offices

(₹ in crore)

Year	National Museum		NRLC	
	Budget estimates	Actual expenditure	Budget estimates	Actual expenditure
2007-08	18.04	11.02	3.05	2.91
2008-09	18.04	12.80	5.11	4.71
2009-10	18.92	13.75	5.90	5.25
2010-11	17.75	17.48	5.34	5.07
2011-12	18.45	15.23	5.65	5.72

Source: Outcome budget documents of the Ministry of Culture

From the above table it is revealed that NM and NRLC failed to utilise their allotted budget.

7.3 Other Museums and Societies

Grants-in-aid are released to the Museums/ Societies functioning as Autonomous bodies and Grant in aid institutions under the Ministry of Culture. The trend of grants-in-aid released to the five Museums and two Asiatic societies funded by the Ministry is shown in the table below.

Table 7.5: Grants in aid released

(₹ in crore)

Sl. No.	Organisation	2007-08	2008-09	2009-10	2010-11	2011-12
1.	Allahabad Museum, Allahabad (AM)	2.25	2.92	2.29	3.15	2.15
2.	Asiatic Society Kolkata (ASK)	8.01	10.40	17.23	14.35	13.70
3.	Asiatic Society Mumbai (ASM)	0.35	0.50	1.00	1.00	0.78
4.	Indian Museum, Kolkata (IM)	6.46	9.69	14.48	16.14	10.96
5.	Salarjung Museum (SMH)	11.70	16.25	22.14	20.89	17.12
6.	Victoria Memorial Hall Kolkata (VMH)	7.20	7.64	7.69	9.15	10.63
	TOTAL	35.97	47.40	64.83	64.68	55.34

7.3.1 Diversion of Funds from Plan Head to Non Plan Head

We noticed that the Indian Museum diverted the plan grant of ₹ 161.09 lakh and ₹ 0.32 lakh during the years 2007-08 and 2008-09 respectively to non plan heads to meet the excess expenditure. Similarly, Asiatic Society, Kolkata also diverted ₹ 221.03 lakh in 2011-12 from plan heads to non plan heads.

7.3.2 Irregular Excess Expenditure

We also noticed that irregular excess expenditure was incurred in the Indian Museum, **Asiatic Society Kolkata (ASK)** and **Victoria Memorial Hall (VHM)** as given below:

Indian Museum	• **Against the plan grant of ₹ 477.31 lakh received in 2011-12, the expenditure incurred was ₹ 1055.86 lakh. However no prior approval was obtained.** • **₹ 109.41 lakh was incurred on heads like campus development, shifting of library, purchase of car during the period 2007-08 to 2011-12 for which no budget provision was planned.** • **₹ 764.59 lakh was incurred in excess of the allotted budget on security, galleries, education etc. However reasons for excess expenditure were not recorded.**
Victoria Memorial Hall (VHM)	• Against the revised expenditure of ₹ 873 lakh, the expenditure incurred was ₹ 1155 lakh without assigning any reasons.
Asiatic Society Kolkata (ASK)	• Excess expenditure of ₹ 628.95 lakh was incurred but reasons for the excess were not recorded. • ₹ 59.12 lakh was incurred on heads for which no provisions existed.

7.3.3 Unrealistic Budget Preparation

We also noticed that the budget estimates prepared by the **Victoria Memorial Hall (VHM)**and **Asiatic Society Kolkata (ASK)** during 2007-08 to 2011-12 were unrealistic and the Museums failed to utiliseeven the budget allotted as shown below:

Table 7.6: Unrealistic budget of Museums

(₹ in crore)

Sl. No.	Name of the Museum	Budget provision	Budget allotted	Budgetutlised
1.	VMH	45.35	24.79	24.28
2.	ASK	44.13	25.78	23.44

7.4 Other Areas of Concern

7.4.1 Automation in Ticketing

The ASI introduced (2009) a system of bar coded Common Entry tickets. The tickets were to be printed by Government of India Security Press, Nasik. However, we noticed that no monument site of the ASI was provided with bar code reader machines. Infact, the ASI had not even initiated the procurement process of bar code reader machines. Hence, this automated ticketing system could not be introduced.

We further noted, that in 2005-06 the Delhi Circle had procured automated ticketing system for three monuments i.e., Qutb Minar, Purana Qila and Jantar Mantar by incurring an expenditure of ₹ 8.10 lakh, ₹ 8.45 lakh and ₹ 11.93 lakh respectively. However, the automated system was operational only at Jantar Mantar and that too for nine months only (from October 2006 to June 2007). The matter was under investigation by the vigilance/CBI for alleged irregularities in purchase of these machines. Thus, due to non-functioning of the automated system the expenditure incurred was rendered unfruitful.

In Agra Circle, the ASI had incorrectly made payment to ISP Nasik, for printing 25.50 lakh tickets of ₹ 20 denomination at the rate of ₹ 4 per ticket instead of ₹ 2 per ticket. This resulted in excess payment of ₹ 51 lakh. No action was taken by the department to refund/adjust the excess amount.

7.4.2 Other Irregularities in Tickets Stock

We noticed that at many ticketed monuments, due to high vacancies in permanent cadres, temporary staff was being used at ticket counters. e.g. in Delhi Circle, out of the 10 ticketed monuments, in two cases i.e. Safdarjung Tomb and Jantar Mantar, temporary staff was deployed at the ticket counter and in Sultan Garhi a monument attendant was deployed. Similarly in Srinagar Circle also, out of the four ticketed monuments, temporary staff was deployed at the ticket counters in two monuments. Handling of public fund by temporary staff lends itself to a high risk of misappropriation.

We noted that out of eight lakh tickets received by the Taj store from the CA Taj Mahal office, only 6.5 lakh tickets were issued to the counters for sale. However, the stock register showed NIL balance. Further, revenue realised on sale of 31784 tickets amounting ₹ 6.36 lakh was not deposited into the Government account. On it being pointed out, the Circle stated that the discrepancy had been reconciled. The reply was not verifiable as the relevant records had been tampered through overwriting and cuttings.

Till 2009, the ASI wasusing bell punched tickets at its ticketed monuments. DG, ASI imposed (December 2009) a ban on the use of these tickets and directed to commence sale of bar coded tickets (**Refer Para 7.4.1**). We noted that in many monuments, the bell punched tickets were being used in violation to DG's specific directions. Further, the ASI did not carry out the stock verification of old tickets lying at the Circle / monuments before introducing the system of issuing bar coded tickets. The absence of information regarding the stock of the tickets is fraught with the risk of unauthorised use of banned tickets.

7.4.3 Non Maintenance of Counter Foils of the Used Tickets

The Archaeological Works Code provided that the counter foil of the used tickets should be maintained at least for three years and then it should be weeded out by following the proper procedure. However, it was noticed that Sub Circle/Circle office were not maintaining the counter foils of the used tickets. In Delhi Circle, the Sub Circle offices were destroying the counterfoil on the same day in violation of the procedure prescribed in the AWC.

Recommendation 7.3: *The ASI needs to streamline the procedures for ticketing and collection of entrance fee at ticketed monuments.*

The Ministry stated (May 2013) that consultants had been appointed by the ASI to firm up the mechanism keeping in view the complexities at the monuments and the type of visitors.

7.4.4 No Efforts to Diversify Revenue Generation

The Ministry did not take any initiative to introduce new modes of revenue generation from the monuments and the museums. In most of the Sites, no souvenir shops, customised tours or specialised facilities on charge basis were available, unlike the global best practices.

Recommendation 7.4: *The Ministry needs to diversify and explore on the new modes of revenue generation from the Heritage Sites and Museums. Options should be explored in view of best practices adopted globally.*

7.4.5 Irregular Retention of Government Money in Personal Account by National Museum

As per Rule 6 of the Receipt and Payment Rules, all moneys received by or tendered to Government officers on account of revenue or receipt or dues of the Government shall, without undue delay, be paid in full into the accredited bank for inclusion in Government account.

National Museum entered into an agreement with a private firm[56] in August 2003 for providing audio guide services. The fees charged from the visitors for providing the audio guide service was to be shared between the firm and the museum as per the agreement. We noticed that the money received on account of audio guide services was deposited in a separate saving bank account opened in the name of two officials of the National Museum in October 2005. The amount was deposited in this account till August 2007 when National Museum closed this account in the name of individual officers and opened another account in the name of National Museum. Keeping the government money in the personal account of the officials from October 2005 to August 2007 was highly irregular.

The National Museum accepted the audit observation and stated (December 2011) that the separate bank account was opened with the permission of the Director General, National Museum.

7.4.6 Non Recovery of Licence Fees

National Museum provided the office space to three organisations viz. National Museum Institute, The Handicraft and Handlooms Export Corporation of India Limited and M/s Khatirdari Catering Services. We noticed that the National Museum did not charge the prescribed market rate of licence fees from these organisations as per the terms and conditions of the Ministry of Urban Development.

[56] M/s Narrowcasters India Private Limited

CHAPTER – VIII

Manpower Management

Adequately trained, experienced and sufficient manpower is a pre requisite for the functioning of any agency involved in Heritage Conservation. We found that the organisations engaged in heritage conservation in India were facing an acute shortage of technical manpower.

8.1 Manpower Management in the ASI

8.1.1 Shortage of Manpower

The overall position of sanctioned strength vis-à-vis men in position in different cadres revealed an acute shortage of staff. With the passage of time, the work profile and scope of work had undergone sea change in the ASI. This adversely affected the performance and output of the organisation. The shortage ranged between 21.4 *per cent* to 41.7 *per cent* as given in the table below:

Table 8.1 Position of manpower of the ASI

Sl. No.	Classification of posts	Sanctioned Strength	Filled	Vacant	Percentage of Vacancy
1.	Group A	235	137	98	**41.7**
2.	Group B	459	328	131	**28.5**
3.	Group C	1599	1257	342	**21.4**
4.	Group D	6152	4275	1877	**30.5**
Total		**8445**	**5997**	**2448**	**28.9**

We noticed that four posts of ADG Archaeology and 18 posts of Joint Directors General, which were newly created in 2011, were lying vacant since their creation.

8.1.2 Capacity Building for Conservation

Capacity building of staff through proper training and deployment is crucial for the proper execution of conservation works. Heritage Conservation required adequate specialisation, technical knowledge and close supervision.

We found that the ASI had a full fledged cadre for conservation work. This ranged from the Director (Conservation) to the Foreman (Works) in addition to various technical posts of engineers and conservators. The Sub Circle offices were headed by Conservation Assistants, responsible for carrying out the conservation works on the monuments, with the help of Foreman under the guidance of the Assistant/Deputy Superintending Engineers. The Horticulture and Science Branches had technically qualified staff to carry out environmental and chemical conservation works respectively.

8.1.3 Vacancies and Shortfalls in Technical Cadre

The sanctioned strength of the three main conservation Branches mainly included the technical posts of archaeologists, engineers, horticulturists and chemists. Even at the group 'D' level, the monument and garden attendants played a significant role in the preservation and conservation of monuments. The staff position of these Branches was as follows:

Table 8.2 Details of vacancies in conservation Branches

	Sanctioned posts	Filled posts	Vacant Posts
Conservation Branch	503	369	134
Horticulture Branch	114	106	8
Science Branch	140	123	17
Total	757	598	159

Thus, out of the 757 sanctioned posts for conservation works, 159 posts (21 *per cent*) were vacant. Besides this, out of the 1267 posts of Garden Attendants, in the Horticulture Branch, 246 posts (19 *per cent*) were vacant.

The Parliamentary Standing Committee in its report of 2005 had also expressed concern on the vacancies in crucial technical cadres.

8.1.4 Shortage of Monument Attendants

Monument Attendants of the ASI were responsible for day to day maintenance of the monuments including vegetation clearance, cleaning, dusting, sweeping, regulating the visitors, rendering assistance in the sale of entry tickets, etc. besides security. The ASI had 3678 existing monuments. Out of 3458 sanctioned posts, 1279 (37 *per cent*) posts of Monument Attendants were vacant. Consequently most of the monuments had no full time guards. The cases of theft, encroachment, unauthorised constructions etc in the monuments which have been discussed in

chapter 9 could be attributed to shortages in staff strength of monuments attendants.

8.1.5 Distribution of Work

The distribution of work was also uneven and in some cases Conservation Assistants had as many as 50 monuments, spread out geographically, under their control. This made the task of regular supervision and close monitoring practically impossible. For instance, in the Agra Circle, monuments under the control of a Conservation Assistant were more than 30 kilometers away from the Circle office and spread over various districts.

8.1.6 Use of Technical Staff for Administrative Works

The cadre of Conservation Assistant (CAs) is the crucial cadre for maintenance, security and upkeep of a monument. We found that the CAs were overloaded with administrative works, viz. daily receipts and deposit of revenue, monitoring of security, handling of legal cases, issue of notices to unauthorised constructions and other routine work. These additional responsibilities significantly reduced the time available with them for their prime responsibility of documentation, execution and supervision of ongoing conservation works.

8.1.7 Unclear Reporting: Hierarchy

The ScienceBranch had three divisional offices (each headed by a Superintending Archaeological Chemist (SAC)) and 11 zonal offices (headed by Deputy Superintending Archaeological Chemist (DSAC). There was no specified criterion distinguishing between divisional and zonal offices. Some of the zonal offices (e.g. Zonal Office Delhi) were directly reporting to the Director (Science) whereas others (e.g. Zonal office Patna) were reporting to the concerned divisional office. Similarly the extent of jurisdiction also differed from one zonal office to another. Some were exclusively looking after the monuments in one Circle, whereas in other cases, the jurisdiction extended to several Circles.

8.2 Efforts to Fill the Vacant Posts

8.2.1 Recommendations of Committees

The manpower management of the ASI was reviewed from time to time in the past by various committees as given in the table below:

Table 8.3 Recommendations of the committees on manpower

Sl. No.	Committee	Year	Action taken on the recommendations
1.	Wheeler Committee	1965	Not provided to audit.
2.	Estimates Committee of Lok Sabha	1973-74	The recommendations of these committees were taken up when they were already outdated.
3.	Expert Group on Archaeology, Mirdha Committee	1983-84	No action was taken on the report of the Committee.
4.	Vth Central Pay Commission	1997	Recommended constitution of a Central Archaeological Service comprising cadres of Archaeologists, Scientist, Epigraphists and conservationists in the ASI. The recommendations were not implemented.
5.	Review Committee under Prof. B.B. Lal	2001	Recommendations were broadly accepted by the Government of India but none of the recommendations had been implemented so far.
6.	Moily Committee	February 2010	Recommendation had not been implemented so far.

We could not ascertain the reasons for non-implementation of these recommendations. This adversely affected the functioning of the ASI.

8.2.2 Recruitment through Staff Selection Commission (SSC)

We noted that recruitment through SSC was yet to materialise (November 2012) as the ASI and the SSC could not reach an agreement relating to the percentage of marks criteria for SC, ST and OBC candidates. As a result, there were 80 vacancies in various cadres against the sanctioned strength of 178.

8.2.3 Appointment of Consultants

In order to meet specific requirements, the ASI had also engaged 21 Consultants in various fields, viz conservation, legal, human resource, etc. from time to time after taking approval of competent authority i.e. IFD. The ASI had also outsourced 31 data entry operators, stenographers, cooks etc. during 2009-10 to 2011-12.

We found that all these contractual appointments in Circles were for routine office work and not for undertaking the core activities of the ASI. Hence, the shortages in the crucial cadres were not bridged by even appointment of consultants.

8.2.4 Non formulation of Recruitment Rules

We noted that the newly created four posts (2011) of ADG archaeology, and eighteen posts of Joint Director General were vacant as the Recruitment Rules (RRs) had not been framed till date. Further 14 posts of Deputy Superintending Archaeological Engineer, one Deputy Superintending Epigraphist (Sanskrit inscriptions), two senior artists, four Modeller Grade II, two mechanics and many Group 'D' posts were vacant as Recruitment Rules were under revision.

The Institute of Archaeology was founded in 1958-59. As a part of its upgradation, the Ministry of Finance approved the creation of 45 posts in different categories w.e.f. April 1985. These posts were also not filled up for want of Recruitment Rules. No priority was accorded to this work and as a result, the posts continued to remain vacant.

8.3 Failure to Obtain Status of a Scientific Department

In accordance with the recommendation of a group set up by the Department of Science and Technology, the Secretary, Department of Science and Technology had approved the ASI as a Science and Technological institution with effect from May 1989. The ASI was designated as "Science and Technology department" vide notification of October 1989 by the Ministry of Human Resource Development. We noticed that for this purpose information on the scientific and technical achievements, functions, activities, research of the Directors and Chief Horticulturist was to be submitted to the Ministry in the prescribed proforma. However, the ASI was unable to collect the data as of November 2012. As a result, the department could not be included within the framework of a Science and Technology Institution.

8.4 Functioning of Regional Directorates

Five Regional Director's (RD) were formed (April 2009) with a view to serve as an interface between the Directorate General (DG) and the field offices. The function of the RD office was to guide, supervise and control the field offices. We noted that the Regional Directorates were functioning without supporting staff and in most cases the Superintending Archaeologists were holding the additional charge of Regional Directors.

The ASI's efforts to fill in the vacancies were thus found inadequate. The Ministry also failed to provide the required oversight to address this pressing issue.

8.5 Manpower Management of Museums

Similarly it was noticed that the museums were all also under staffed. The details of sanctioned and vacant posts in museums were as follows:

Table 8.4 Position of vacant posts

Sl. No.	Name of the Museum	Sanctioned strength	Vacant posts	Period of vacancy
1.	National Museum	276	122	Some of the posts were vacant since 1983
2.	Allahabad Museum	86	15	Not available
3.	Salar Jung Museum	166	39	One year seven months to 16 years
4.	Indian Museum	209	60	Not available
5.	Victoria Memorial Hall	176	53	Four months to 25 years and one month
6.	Asiatic Society, Kolkata	257	45	Four months to two years and three months

The National Museum functioned without a full time Director General during September 2007 to 2011.

Recommendation 8.1: *The Ministry should take immediate steps to resolve manpower shortages especially in the crucial cadres engaged in Conservation related works.*

The Ministry intimated (May 2013) that the restructuring proposal of the ASI is being worked out to address the shortage of manpower on long term basis.

8.6 Manpower Management in NMA

8.6.1 Irregularities in Selection of Members

A selection committee chaired by Cabinet Secretary was constituted to appoint the whole time and part time members of the NMA. The committee included three experts viz. Prof A.G.K. Menon (conservation expert), Prof B.N. Goswamy (eminent art historian) and Shri Balkrishna Doshi (eminent architect). **No records were submitted to audit by the ASI, in respect of the basis of selection of these three experts.**

Department of Personnel & Training (Ministry of Public Grievances & Pensions) vide their letter dated 22nd June 2010 instructed that the maximum age at the time of selection of members of the authority should not be more than 59 years and the minimum age should be 55 years for such appointment.

However, in the advertisement released by DG ASI, seeking the application for appointment as a member, with no minimum age mentioned and the maximum age mentioned was 67 years. Though the 'errors' in the advertisement were noticed before processing the applications and proposal was submitted to issue a fresh advertisement after incorporating the instructions of Department of Personnel & Training , DG ASI decided to go with the applications received through erroneous advertisement .

Reasons for not following the instructions of Government of India, (Department of P&T) were not recorded at any stage.

Interestingly, for members of NMA, applications were invited from the eminent professionals with proven experience and expertise in the fields of

- archaeology,
- country and town planning,
- architecture heritage,
- conservation architecture or
- law.

There was nothing on record to elucidate this selection of subjects. No details of minimum experience were mentioned in the advertisement. We could not appreciate the reasons for including "law" as one of the field of expertise as the work does not include complex legal issues.

In response to an advertisement released in 10 newspapers in October 2010, 163 applications were received which were shortlisted by these three experts and then interviews were called for the 15 shortlisted candidates by the selection committee. 15 shortlisted candidates were those candidates who were selected either by three of the experts or by two of the experts. We found only two lists of shortlisted candidates in record - one mentioning the number as 13 and the other as 15. However the list of shortlisted candidates by Prof. BN Goswami was not found in record. In the absence of this, the authenticity of shortlisted candidates by three experts cannot be ensured. It was also not recorded, on what basis this short listing was done by these three experts.

The list of 163 candidates also was not full proof as the name of one of the candidate Dr VN Paranjape was mentioned thrice in the list. Reasons for the same were not submitted to audit. The committee headed by Cabinet Secretary interviewed the shortlisted candidate and finally selected only one whole time member and two part time members.

8.6.2 Non Filling Up of Posts

Thirteen posts were sanctioned for NMA, however, it was noticed that out of the 13 sanctioned posts, only three posts viz Member Secretary, Administrative Officer and Photo Officer[57] were filled up and the balance 10 posts were vacant. In the absence of full time employees, NMA hired 19 consultants with a monthly remuneration ranging from ₹ 15000/- to ₹ 50,000/- besides hiring the clerical and class IV staff through a recruitment agency. One of the reasons for not filling up some of the posts was non-receipt of applications for the suitable candidates as the pay scales in ASI for the similar posts[58] are higher than in NMA. The NMA never took up the issue with the ASI or Ministry for fixing the pay scales at par with ASI.

Thus, while the ASI attributed almost all shortcomings in performance to lack of proper manpower, the Ministry showed no urgency to rectify the situation. This indicated that the Ministry failed to exercise adequate oversight over this critical issued.

[57] Member Secretary assumes additional charge of NMA in November 2010 and resumes the full fledged charge in March 2011. Both other officers are on deputation from ASI since June-July 2011.

[58] Posts of Architectural Drawing Officer and Survey Officer having grade pay of ₹ 4600 in ASI and ₹ 4200 in NMA.

CHAPTER – IX

Security of the Monuments and Antiquities

Security of a site or a monument is integral to its protection. The ASI is also assigned the responsibility of security of the centrally protected monuments from the risk of encroachments, unauthorised access, damage of the site and theft of parts. Many of these protected sites are symbols of our nation and are therefore vulnerable to attacks and damage by miscreants. These monuments have varying security needs. The ASI made rules and issued several notifications to avoid any unauthorised construction in and around the monuments.

9.1 Encroachment and Unauthorised Construction in and around Monuments

9.1.1 Encroachments



Two Cemeteries, Lucknow



Cuttack Club at Barabati Fort, Cuttack

The AMASR Rules, 1959 provided that within a protected monument, no person could indulge in any act which causes or is likely to cause damage or injury to any part of the monument. The Act further provided that no person, including the owner or occupier of a protected area, shall construct any building, within the protected area or carry on any mining, quarrying, excavating, blasting or any operation of a likely nature in such area, or utilise such area or any part thereof in any other manner without the permission of the Central Government. Thus the occupation/any other unauthorised activity in the protected area was to be treated as an encroachment.

We noted that many centrally protected monuments were under encroachment by individuals, private organisations and even Government departments. The ASI informed (April 2012) that there were 249 monuments encroached by individual/organisations. However, this information was not correct as explained below:

Scrutiny of records of Circles and joint physical inspection of selected 1655 (45 *per cent*) of the 3678 centrally protected monuments revealed that there were encroachments in around 546 monuments as against 249 intimated by the ASI HQ. Circle wise details of the encroached monuments are given in **Annex 9.1**. Out of these 546 encroachments, Government departments/agencies were responsible for encroachments in 46 monuments.

Evidently, the Sub Circles did not inform the concerned Circle office about the existence of encroachment in the monuments. This indicated that either the monuments were not inspected by the Sub Circle officials periodically or encroachments were made with the connivance of the Sub Circle officials. There was no report/procedure to gather information about encroachment from Sub Circle to Circle office for the ASI HQ office periodically.

Some of the most obvious instances of encroachment as observed in Audit are the following:

Table 9.1 Cases of encroachment

Sl. No.	Name of the Circle	Name of the monument	Area of concern
1.	Bhubaneswar	Sisupalgarh Fort(Dist: Odisha)	The notified area was 562.681 acre out of which only 0.775 acre was with the ASI and the rest was with the State government and private owners. The State Government had converted the agriculture land to residential and allowed construction of several buildings. The ASI failed to take any concrete action against the encroachment.

Sl. No.	Name of the Circle	Name of the monument	Area of concern
			The ASI also failed to take up the matter at the Ministry level to stop these activities, in coordination with the State Government.
2.	Hyderabad	Golconda Fort	The Naya Qila, Qutub Shahi Mahal was included in the Golconda Fort through an amendment in the original notification of 1951 issued in 1988. However, the same was not communicated to the State Government of Andhra Pradesh. The State government allowed the land within the monument to be used as dumping yard in the Naya Qila, which was subsequently licensed to the Hyderabad Golf Club for laying a golf course.
3.	Jaipur	Moat surrounding the Fort wall, Bharatpur	Municipal Council, Bharatpur encroached and constructed a drain for rain and waste water of city areas near the moat wall through the Rajasthan State Road Development Corporation (RSRDC) without permission of the ASI. The drain constructed by RSRDC was faulty in design and was left incomplete with the result that it collapsed,damaging the moat wall.
4.	Kolkata	Moti Jheel Masjid	The monument was notified in 2011 despite widespread encroachments and functioning of a *Madarsa* within the monuments. The *Madrasa* was still functional and some people were residing inside the campus of the mosque. This restricted the ASI's control over the site.
5.	Kolkata	Clive House	The monument was notified in 2004 without evacuating 22 families residing in the House. These families were still residing illegally in parts of the building (May 2012) where the Circle office did not have any access.
6.	Trissur	Bekal Fort	The rest house in the Bekal Fort was constructed by the State Government on the protected area. In 2001 the State Government of Kerala handed over the rest house building to the

Sl. No.	Name of the Circle	Name of the monument	Area of concern
			Tourism Department for upgrading and managing it through M/s Bekal Resorts Development Corporation (BRDC). Later on, State PWD, transferred the Rest-house building to the BRDC on lease. Thus this encroached building continues to function inside a protected monument.
7.	Raipur	Chitturgarh Fort, Bilaspur	Forest Department, Katghora Division constructed a rest house and ECO building within the protected area. A Shani Temple and a Hanuman Temple were constructed by villagers and Jyoti Bhawan and Bhog Shala were constructed by the Temple Trust Samiti. All these constructions were made without prior permission of the ASI.
8.	Raipur	Danteshwari Temple, Bastar	A meeting hall and house for the priests were constructed by the temple trust and a solar system panel room was constructed by Chhattisgarh State Renewable Energy Development Agency (CREDA) within the protected area.
9.	Delhi	Tuglaqabad Fort	During site inspection in 2006, the security officer of the ASI in his report mentioned that the local MLAs had encroached the area of the Tughlaqabad Fort. Despite orders of High court of Delhi in 2002[59], the ASI failed to get the encroachment vacated from the Fort due to lack of cooperation from the police and district administration. We did not find any evidence to the effect that the matter was taken up with the Ministry for pursuance at higher levels with the State Government.

The ASI attributed reasons for encroachment to non-availability of staff and lack of cooperation from the State Governments.

[59] SLP No. 4821/2002

***Recommendation 9.1:** The ASI should constitute a coordination body with representatives of respective State Governments at each Circle to check the incidents of encroachments with the cooperation of District and police authorities.*

***Recommendation 9.2:** There should be regular monitoring of existing encroachment cases by the Ministry at the highest level. Encroachment by State Government agencies or other Government of India agencies should be sorted out in a time bound manner by raising the matter at higher levels.*

The Ministry (May 2013) accepted the recommendation for constitution of coordination committee at State and District levels.

9.1.2 Unauthorised Construction in the Prohibited and Regulated Areas

The AMASR Rules, 1959 provided that before declaring an area near or adjoining a protected monument to be a prohibited area or a regulated area for the purpose of mining operation or construction or both, the Central Government was to give one month's notice. A copy of such notification was to be affixed in a conspicuous place near the site. After the expiry of one month from the date of the notification after considering the objections, the Central Government was to declare the area specified in the notification or any part of such area, to be a prohibited area, or as the case may be, a regulated area for the purposes of mining operation or construction or both.

The ASI declared (June 1992) areas up to 100 meters from the protected limits and further beyond it 200 meters near or adjoining protected monuments to be prohibited and regulated areas respectively for purposes of both mining operation and construction.

At the time of issue of this amendment, the ASI was required to identify all constructions made on and after 16 June 1992, in all prohibited areas and regulated areas and submit the report to the Central Government. However, the ASI failed to collect this information. As a result the ASI (December 2012) had no information in respect of the buildings constructed till 1992 and the buildings constructed after 1992 within the prohibited and regulated areas of the monument. In the absence of this vital information, the implementation of the amendment was doubtful.

We noted that there were **9122 cases of unauthorised construction** as shown in **Annex 9.2** in the prohibited and regulated areas of the protected monuments. As per the information available with the ASI, in 98 cases, unauthorised construction was carried out by the Government departments/agencies.

We also noted severe coordination problems with the State departments like Police and Municipal Corporations which led to non-clearance of unauthorised

construction. It was also noticed that in many cases despite best efforts of the ASI officials, District Authorities and Police were not cooperating.

Construction Carried Out Around Jantar Mantar, Delhi



One of the glaring examples of the adverse consequences of unauthorised construction could be found at the Jantar Mantar, Delhi which is a centrally protected monument. Jantar Mantar was constructed during 1724-1734 to measure the accurate time, movement of star and sun and the altitude and azimuth of celestial objects by studying the shadows created by the sunlight on the different yantras (instruments) installed at the monument. However, due to the construction of high rise buildings near Jantar Mantar, the sunlight had been blocked and the instruments had become defunct.

In 2002, the High Court of Delhi opined that prohibition of construction must not be left to an inflexible rule of thumb but must be arrived at after a conscious and objective application of mind. The Court directed the Central Government to review its notification dated 16 June 1992 within a period of six months from the date of the judgment. However, no such review was carried out as of December 2012.

Baradari Site, Arzimukhimpur, Santhal



Water logging in and around Baradari Site

Another instance of unauthorised construction related to Baradari Site, Arzimukhimpur, Santhal at Ranchi Circle. During a site inspection we found that due to prolonged mining activity of China clay, a deep ditch[60] filled with water had been created around the monument. An underground cell of the monument had completely vanished and two-third of the monument was damaged by water logging. Further, while as per records the area of the monument was 3.84 acres, the site visit revealed that the area under possession (fenced) was not more than 2 acres approximately.

Some other instances of the unauthorised construction where no action was taken by the ASI were as follows:

Table 9.2 Cases of unauthorised construction

Sl.No.	Name of the Circle	Name of the monument	Area of concern
1.	Kolkata	Madan Gopal Temple, Cooch Behar	FIR against the unauthorised construction was lodged only after the joint physical inspection by the Audit team along with the staff of Sub Circles.
2.	Kolkata	Rashmanch, Bishnupur	FIR against the unauthorised construction was lodged only after the joint physical inspection by the Audit team along with the staff of Sub Circles.
3.	Leh Mini Circle	Hemis Monastery	Local associations of the Hemis monastery carried out modern construction by building a modern museum in the prohibited and regulated areas. However, no FIR was lodged by the ASI
4.	Hyderabad	Sri Kodandarama temple, Paddamudiyam, Cuddapah	No objection Certificates (NOCs) were issued by the Circle office for erecting mobile phone towers in the prohibited and regulated area against the provisions of AMASR Act, 1958 and the notification of 1992.
5.		Charminar, Hyderabad	Mobile phone towers and hoardings were erected near the monument. No show cause notice was issued by the circles.
6.		Bhimeswaraswamy temple, Pushpagiri, Cuddapah	Circles issued NOC for construction of Tourism Information Centre at a distance of 88 meters from the protected area of the monument against the provisions of AMASR Act.

[60] About 20-30 ft. deep

7.		Uma Maheswara Swamy temple, Yaganti, Kurnool	State endowments department without the permission of the ASI constructed a foot over bridge connecting the temple and cave temple, both protected monuments and no action was taken by the ASI.

9.2 Implementation of the AMASR (Amendment & Validation) Act, 2010

To resolve the issues of unauthorised construction and to ensure strict implementation of the Act, the new AMASR (Amendment & Validation) Act 2010 was introduced. AMASR (Amendment & Validation) Act 2010 authorised the Central Government to constitute National Monument Authority (NMA) and Competent Authority for dealing with the permission required for repair/renovation in the prohibited area and construction/re-construction in the regulated area of the centrally protected monument.

We observed several shortcomings in the system as discussed in the succeeding paragraphs.

9.2.1 Establishment of National Monument Authority and Competent Authority

The AMASR (Amendment & Validation) Act, 2010 stated that Central Government was to constitute the National Monument Authority. However, it was noticed that the notification was issued only in December 2011 i.e. 20 months after the passing of the Validation Act, 2010 in March 2010 that too with only one whole time member and two part time members instead of five each as per the Validation Act.

The Chairperson was appointed in August 2012 i.e. more than two years after passing of the Act. The Government failed to appoint four whole time members and three part time members till date (September 2012). The delay in appointment of members of NMA adversely affected the functioning of the NMA.

As per the Validation Act 2010, the Competent Authority means an officer not below the rank of Director of Archaeology or Commissioner of Archaeology of the Central or State Government or equivalent rank, specified by notification in the Official Gazette, as the Competent Authority by the Central Government.

9.2.2 Delay in Setting up of NMA

It was noticed that the Chairperson was appointed in August 2012 only i.e. 28 months after passing of Act. The Government failed to appoint four whole time members and three part time members till date (September 2012). The delay in appointment of members of NMA definitely hampers the efficiency of the authority.

9.2.3 Processing of Applications for NOC

Section 20 C to E of the Validation Act 2010, defined the procedure of issuing No Objection Certificate (NOC) for repair/construction in the prohibited/regulated area of the monument which is as follows:

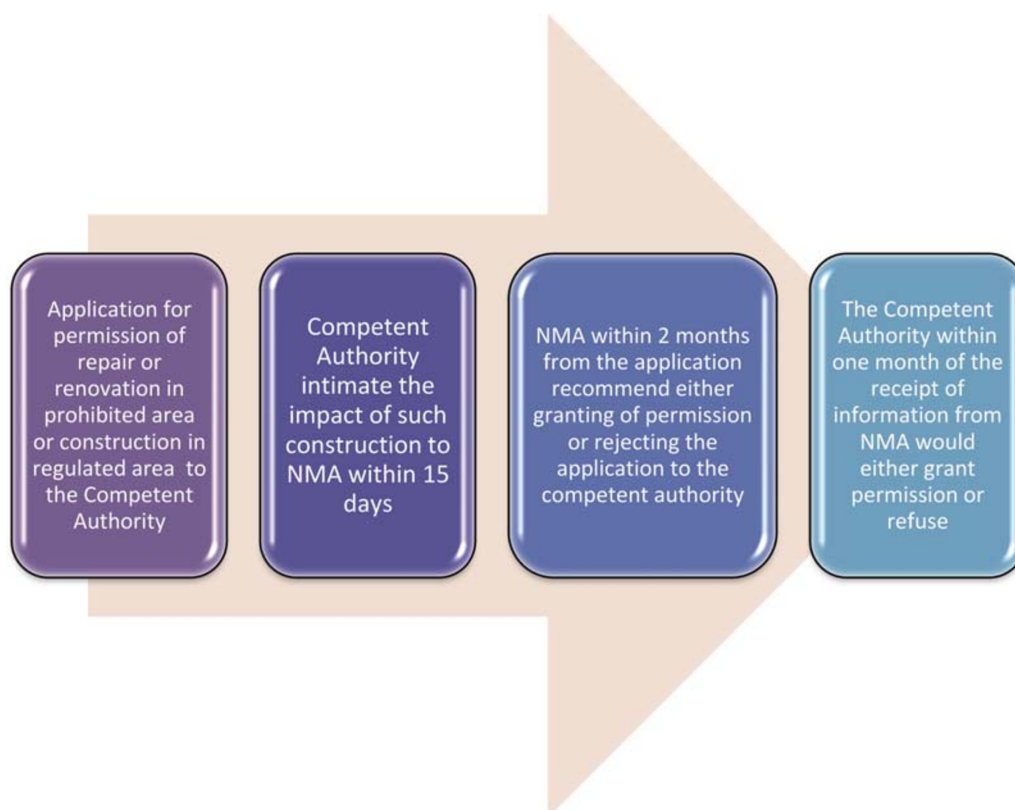


Chart 9.1 Process of issue of NOC

Till 31 March 2012, NMA had received 781 applications duly recommended by the Competent Authorities. Of these, only 259 applications (33 *per cent*) were submitted to the Authority in their meetings. There was nothing on record to suggest how these 259 cases were selected out of 781. In absence of any documentation we were unable to verify the manner in which these applications were selected for processing. The main reason attributed to processing of fewer applications was delay in selection of members of the NMA.

The Act defined the timelines for processing the applications received from the applicants for issuing/rejecting the NOCs. As per the prescribed timelines, the applicant should get the response within a maximum period of three and a half month from submission of the application.

We test checked 71 cases out of the 162 cases (44 *per cent*) recommended by NMA for issue of NOC till 31 March 2012 and noticed delays in processing the cases as given in the following table:

Table 9.3 Delay in processing of applications by NMA

Processing of applications by Competent Authority			Processing of applications by National Monument Authority		
Cases of delay	Time required as per Act	Delay in processing the application by Competent Authority	Cases of delay	Time required as per Act	Range of delay
61	15 days	7day to 316 days	29	2 months	1 month to 12 months

We also noticed that despite such delays, proper scrutiny of the applications received from the owners for renovation/construction was not carried out by the Competent Authority and by NMA officials. Some of the significant shortcomings were as follows:

- As per records submitted, the site inspections were carried out even before submission of the application by the applicant,
- Applications were not submitted/not properly submitted in prescribed form I,
- Files were submitted to NMA without the prescribed form II by Competent Authority,
- Cases were submitted by Competent Authority without enclosing the site plans and
- The proposals were approved for the purpose other than those requested by the applicants.

All the applications received from the Competent Authority were required to be presented before the NMA. The Member Secretary was required to scrutinise the proposals and approve them for onward submission to the NMA for their recommendations. However, this requirement was not followed before submission of the application to the NMA members.

We further noted that no information system was in place in NMA to monitor the delays, if any, and the reasons for the delays in processing the applications. The NMA did not maintain the required information such as: date of applications received, date of inspections carried out by competent authorities, date of receipt of application in NMA, date of presenting the case in the meeting of the members and the date of issue of recommendations.

In view of the systemic lapses brought out above we could not conclude that the NMA and Competent Authorities were able to discharge their functions efficiently and effectively.

9.3 Provision of Adequate Security Measures

Besides threats from persons who had carried out the unauthorised construction, the ASI was also required to safeguard from risks arising from visitors to the monuments. These sites were also vulnerable to terrorist attacks and such other destructive activities.

To fulfill this objective, the ASI provided security to the monuments through

(i) The ASI's own staff viz monument attendants, watch and ward staff;

(ii) Government security agencies e.g.CISF;

(iii) State police forces; and

(iv) Private security guards appointed by the ASI.

We noted that the ASI was unable to undertake adequate security measures for the protection of monuments due to lack of sufficient manpower. As per the information provided to the Moily Committee in 2010, approximately 2500 protected monuments did not have full time security personnel. Due to the poor state of records and documentation, the ASI could not provide exact number of such monuments to us.

The findings relating to manpower management are discussed separately in **Chapter 8**.

9.3.1 Assessment of the Security Requirements

The monuments and sites protected by the ASI varied significantly in area, terrain, structure etc. The ASI did not carry out any assessment of the total number of security personnel required to protect each of these monuments and sites. We noted that the activities related to the security of the monuments were being largely carried out through private security guards hired by the ASI from M/s SIS. Security assessment was made by the Central Industrial Security Force (CISF) for only two monuments i.e. the Taj Mahal, Agra and the Red Fort, Delhi.

We noted that while private security guards were deployed, the site plan and maps of the monuments were not considered at all in the security assessment for a site. Further, the area, structure, location and importance of the other protected monuments were also not considered. The requirement for Private security personnel was enhanced in August 2011, from 800 to 1500 without any comprehensive assessment. At the same time, no security guards were found

deployed at 1468 centrally protected monuments by our teams (Details in **Annex 9.3**).

The ASI informed that a committee had been constituted in 2012 to review the security arrangement and assess the performance of private security guards. However, the details of the committee along with the report submitted by them, if any, were not provided to us despite our requisition.

9.3.2 Security Equipment at the Monuments

We noticed during the joint physical inspection of the monuments that adequate security equipment was not installed at the monuments. The ASI informed that no security equipment was procured during last three years, nor was any assessment made by the ASI of the total requirement of such equipments.

Joint physical inspection revealed that no CCTV cameras were installed at most of the monuments. This included the World Heritage Sites which are frequented by a large numbers of foreign visitors. In all the ticketed monuments including some of the World Heritage Sites, there were no metal detectors and baggage scanners (except the Taj Mahal, Agra and the Red Fort, Delhi where the CISF was deployed).

9.3.3 Damage/Theft Cases at the Monuments

In terms of an agreement entered into by the ASI with the security firm, the latter was fully responsible for the damages at the site attributable to negligence, collusion, dereliction of duty etc. of guards deployed at the site.

The ASI informed (August 2012) that they had no information regarding cases of theft, negligence, collusion, dereliction of duty etc.

We however, noted cases of theft at the monuments under the control of nine[61]Circles. We also noted that the ASI HQ made payments to the firm in a routine manner without collecting information in respect of the cases of theft, damages, negligence etc. at the monuments. Thus the ASI made the payments without ensuring compliance with the terms of the agreement.

It was also noticed that Sub Circles submitted the monthly performance report for the private security guards to the Circle office which was forwarded to the ASI HQ. The ASI HQ was to make payment to M/s SIS after scrutinising all these reports. We noted that the system of scrutinising the reports was completely absent in the ASI HQ and payments were made in full despite report of unsatisfactory performance by the concerned Circle.

[61] Bengaluru, Guwahati, Hyderabad, Jaipur, Lucknow, Raipur, Ranchi, Shimla and Trissur

***Recommendation 9.3:** There should be a security plan for each monument, taking into account its location, area, structure, footfall and other vulnerabilities. This exercise should be performed in house by the ASI to ensure coverage of ground level realities.*

***Recommendation 9.4:** The ASI should improve its monitoring of the private security firm.*

***Recommendation 9.5:** The Ministry should ensure availability of funds and staff for adequate security of the monuments*

The Ministry (May 2013) accepted the recommendations.

9.3.4 Security Arrangement at the Museums and Site Museum

Safety and security of art objects was one of the most important functions of the museums. However, the security concerns had not been addressed adequately as discussed below:

9.3.4.1 Deployment of Security Forces

The CISF was not been deployed at the Indian Museum, Kolkata despite specific recommendations of High Power Committee and allocation of total budget of ₹ 120.50 lakh for 2010-11 and 2011-12.

As per the agreement between the Indian Museum and Kolkata Police, 27 armed police guards and three officers were to be deployed and the Indian Museum was to provide accommodation to the deployed contingent. However, the Indian Museum could provide only temporary accommodation to 12 personnel of the contingent. As such, the sanctioned force was not deployed at the museum. This also resulted in excess payment of ₹ 3.27 crore to the Kolkata Police during 2007-12, that was based on the sanctioned strength without reckoning the actual deployment.

The Ministry intimated (May 2013) that the matter of deployment of CISF at Indian Museum had been taken up with the Ministry of Home Affairs.

9.3.4.2 CCTV Cameras and Other Security Equipment

We noticed that the security equipment were not installed or utilised in the museums as detailed below:

Table 9.4 Security equipment not installed or utilised

National Museum	CCTV cameras were not installed in the numismatic gallery II. No CCTV cameras were installed in a room where priceless antiquities from the collection of Aurel Stein were lying in reserve.
Indian Museum	Out of 29 galleries, 14 nos. were not covered under CCTV surveillance. Even the installed cameras were operational only during working hours. Thus there was no surveillance during night. Other security equipment including Fire alarm, Smoke detector, electronic magnetic locks for all doors of the galleries, reserve/vault and Automatic visitors' Biometric Photography system for keeping track of the visitors etc. were also not installed.
Victoria Memorial Hall	Out of 19 CCTV cameras, nine were not working. The rest were operational only during working hours. Out of 12 galleries only four galleries were covered under the CCTV surveillance
Asiatic Society Kolkata	Out of 11 CCTV cameras installed, none had any recording facilities. The CCTV cameras were operational only during the working hours of the museum. Thus there was no surveillance during night. One baggage scanner and one access control system was procured. However, these machines had not been installed till December 2012.
Allahabad Museum	Out of 32 cameras installed, 16 were non-functional.
Nagarjunakonda Site Museum (Hyderabad Circle)	CCTV Cameras were not installed.

Taj Museum, Agra Circle	Two hooter boxes, four fire extinguishers were found not working. A Panasonic Plasma TV bought in December 2010 for ₹ 41000 was not installed. This resulted in non restoration of monitoring and backup of CCTV camera.
Sarnath Museum, Patna Circle	Out of 13 CCTV cameras, six were non functional.
Kangra Fort Museum, Shimla Circle	There was no security equipment at the site museum at Kangra Fort, Himachal Pradesh.
Central Antiquity Collection, Delhi	There were no CCTV cameras or any other security equipment installed.



In the Taj Museum while the replicas were displayed and covered by CCTV, the original coins were kept in safes in a very bad condition without CCTV coverage

The cases above highlighted the need for operating these machines in an optimum manner so as to ensure that the security system is adequately equipped to safeguard the valuable assets.

9.3.4.3 Fire Safety

The Indian Museum did not have any contingency response plan to meet emergency situations. 193 fire extinguishers installed at different locations of the Museum building had not been replaced/refilled beyond their expiry rendering them unfit for use to meet any emergency.

In the case of VMH, the fire fighting drill was carried out only on a single occasion with the security staff during the last five years.

9.3.4.4 Cases of Theft and Loss of Objects

Security lapses led to theft/loss of 37 art objects from the Site Museums of the ASI, 131 antiquities from monuments/sites (**Refer Para 6.11**) and 156 cases of art objects in the National museum during the last 50 years. No proactive action, besides lodging an FIR, was initiated by National Museum to locate these lost art objects.The options available in this regard included displaying pictures of these stolen items on websites, alerting major art dealers and informing international art auction houses.

In the Indian Museum, Museum officials recovered 45 invaluable relics/artifacts wrapped in a towel from the locked almirah of the retired Deputy Director (2007).



Relics/artifacts recovered from the locked almirah of the retired Deputy Director

Antique coins lying in the almirahs of the curator

Similarly in the National Museum also, after the death of a Curator (Numismatic) in 2008, her almirahs were opened leading to recovery of 15 antique coins. However, it could not be verified whether these were from the collection of the National Museum as no physical verification of the coins was carried out earlier. Even four years after her death, these coins were found lying with the present in-charge of the numismatic collection and not placed in the strong room with all other coins. These have not been accessioned in the museum records till date.

Best Practice

The Chatrapati Shivaji Maharaj Vastu Sangrahalaya, Mumbai had a two layer security system viz. internal and external. Only authorised persons had access to the collection and daily checking of artifacts on display was done. Each day, before closure, all galleries were checked in the presence of the officer and security guard. 72 Cameras were installed in the entire Museum and the campus. Entry and exit of all galleries had been covered under CCTV. Further, a special control room had been established for 24 hour monitoring. More than 80 fire extinguishers were installed and the Fire extinguisher system was in place.

Recommendation 9.6: *The Museums should adopt appropriate security measures to provide protection against theft, damage and losses. The Ministry should take initiative in development of a comprehensive Security Policy for Museums with uniform standards for all museums under its control.*

संरक्षित स्मारक

यह स्मारक प्राचीन स्मारक एवं पुरातात्त्विक स्थल व अवशेष अधिनियम 1958 (1958 के 24) के अन्तर्गत राष्ट्रीय महत्त्व का घोषित किया गया है। यदि कोई भी इस स्मारक को क्षति पहुँचाता, नष्ट करता, विलग अथवा परिवर्तित करता, कुरूप करता, खतरे में डालता या दुरूपयोग करते हुये पाया जाता है तो उसे इस अपकृत्य के लिये 3 माह तक का कारावास या रूपये 5000 (पाँच हजार) तक जुर्माना अथवा दोनों से दण्डित किया जा सकता है।

प्राचीन स्मारक एवं पुरातात्त्विक स्थल व अवशेष नियम 1959 के उप-नियम 32 तथा 1992 में जारी की गई अधिसूचना के अन्तर्गत संरक्षित सीमा से 100 मीटर तक और इसके आगे 200 मीटर तक के समीप एवं निकटस्थ का क्षेत्र खनन व निर्माण कार्य के लिये क्रमशः वर्जित तथा नियंत्रित क्षेत्र घोषित किया गया है। उक्त क्षेत्र में किसी भी प्रकार के भवनों की मरम्मत, परिवर्तन तथा निर्माण/नव-निर्माण हेतु भारतीय पुरातत्त्व सर्वेक्षण से पूर्वानुमति प्राप्त करना आवश्यक है।

भारतीय पुरातत्त्व सर्वेक्षण

PROTECTED MONUMENT

THIS MONUMENT HAS BEEN DECLARED TO BE OF NATIONAL IMPORTANCE UNDER THE ANCIENT MONUMENTS AND ARCHAEOLOGICAL SITES AND REMAINS ACT, 1958 (24 OF 1958). WHOEVER DESTROYS, REMOVES, INJURES, ALTERS, DEFACES, IMPERILS OR MISUSES THIS MONUMENT, SHALL BE PUNISHABLE WITH IMPRISONMENT, WHICH MAY EXTEND TO THREE MONTHS OR WITH FINE WHICH MAY EXTEND TO FIVE THOUSAND RUPEES OR WITH BOTH.

FURTHER, UNDER SUB-RULE 32 OF THE ANCIENT MONUMENTS AND ARCHAEOLOGICAL SITES AND REMAINS RULES 1959 AND NOTIFICATION ISSUED IN 1992, AREAS UPTO 100 METERS FROM THE PROTECTED LIMITS AND FURTHER BEYOND IT UPTO 200 METERS NEAR OR ADJOINING PROTECTED MONUMENT HAVE BEEN DECLARED TO BE PROHIBITED AND REGULATED AREAS, RESPECTIVELY FOR PURPOSES OF BOTH MINING OPERATION AND CONSTRUCTION. ANY REPAIR, ADDITION OR ALTERATION AND CONSTRUCTION/RECONSTRUCTION WITHIN THESE AREAS NEED PRIOR APPROVAL OF THE ARCHAEOLOGICAL SURVEY OF INDIA.

ARCHAEOLOGICAL SURVEY OF INDIA

CHAPTER – X

Awareness, Interpretation and Amenities

The primary objective of managing heritage is to communicate its significance and need for its conservation to the host community and to the visitors. Reasonable and well managed physical, intellectual and emotive access to heritage and cultural development was both a right and a privilege. It would bring with it a duty of respect for the heritage values, interests and equity of the present-day host community, indigenous custodians or owners of historic property and for the landscapes and cultures from which that heritage evolved[62].

A protected monument or site would carry little meaning to common people, if there were not enough resources to interpret and explain the cultural and historical significance. Thus, as custodian of centrally protected monuments and sites, it was also important for the ASI to provide adequate interpretation, public amenities and awareness to the visitors.

10.1 Funds Arrangements for Awareness, Interpretation and Amenities

There was no specific budgetary provision for activities related to awareness, interpretation and creating public amenities in the ASI. As a result, expenditure on this account was incurred from the funds allotted for conservation activities. The ASI did not prepare comprehensive plans for providing basic amenities at the monuments. As a result, most of the monuments were found lacking in these facilities, as highlighted in **Para 10.5**.

***Recommendation 10.1:** The ASI should have funds earmarked specifically for awareness, interpretation and related activities.*

There should be laid down standards for amenities and interpretation services applicable uniformly for all protected monuments.

[62] International Cultural Tourism Charter Managing Tourism at Places of Heritage Significance Adopted by ICOMOS in 1999

10.2 Interpretation of the Sites

Heritage conservation required that conservation, interpretation and tourism development programmes were based on a comprehensive understanding of the specific but often complex or conflicting aspects of heritage significance of the particular place.

For interpreting the site, the ASI's efforts were mostly limited to providing signages and notice boards. The ASI provided three types of signage and notice boards on its monuments:

i. **Name of the Monument**

ii. **Protection Notice Board:** Declaring the site as "Protected Monument" and the rules regarding the prohibited and regulated area and the fines for carrying unauthorized activities in and around the monument; and

iii. **Cultural Notice Board:** Describing the history of the Monument in Hindi and English. In some places these cultural notice boards also mentioned folklore and traditions associated with the sites.

Though only third type of signage provided interpretation of the site, the first two categories were equally important to make visitors familiar with the site. We noticed glaring deficiencies in all these three types of signage.

a) At many monuments, the name of the monument was not mentioned. Some examples in the Delhi Circle included the Nicholson cemetery, D'Mero cemetery, Nai-ka-kot, Unknown tomb at Jawahar Lal Nehru Stadium, ancient mosque at Palam. In the absence of the name of the monument, most visitors would find it difficult to recognise it.

b) Similarly it was noticed that the protection sign boards, were not drafted properly at many places. At some places these was not even available. Thus, absence of the signboard increased the risk of encroachment and damage, as most of these protected sites were unguarded.

Our scrutiny of 2461[63] monuments revealed that sign boards of only 1198 monuments were found to be in order as detailed in **Annex 10.1**.

Our observation on cultural notice boards is given in **Para 10.3.1**.

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[63] It included total number of monuments in the 12 Circles and the number of physically inspected monuments at the remaining circles as mentioned in **Annex 10.1**

10.3 Signage Not Installed

We found that most of the Circles were incurring expenditure on the purchase of signage for installing at the monuments under their control. However in many places these were not being put to use. Some illustrative examples are given below:

Table 10.1 Signage not installed

Name of the Circle	Expenditure incurred (₹ in lakhs)	Remarks
Agra	8.11	Signage were found lying in the residence of the chowkidar at Kannuaj, Sub Circle
Agra	12.68	Signage were lying in the store room of the monument at Mathura, Sub Circle
Shimla	19.67	Signage were not installed and were lying with the Circle office
Chennai	73.12	411 protection notice boards had not been installed and were lying with the Circle office



Notice boards lying at Kankalitila, Mathura & Notice boards lying at Old Fort, Kannauj

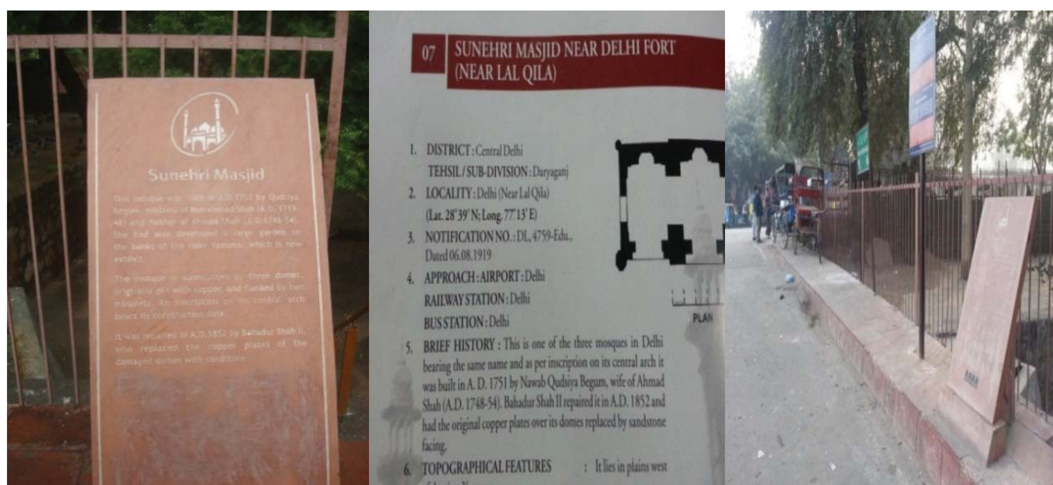
Joint physical inspection of the monuments also revealed that in Delhi Circle, due care was not exercised while installing the signage at the monuments. It was noticed that the signage of the 'Chhoti Gumti' was placed at another monument named 'Sakri Gumti' and the signage of 'Sakri Gumti' was placed at 'Chhoti Gumti'. Even after the discrepancy was pointed out by our team, it was not corrected.

10.3.1 Interpretation of the Monument through Cultural Notice Boards

The interpretation of the monuments through the cultural notice boards was very important for the visitors as in most sites; no other source of information about the site was available. Joint physical inspection of the monuments revealed that the cultural notice boards were found installed by the ASI in only 1153 protected monuments out of 2461 monuments inspected by us. (Details are given in **Annex 10.1)**.

We observed spelling and other factual mistakes in the cultural notice boards at Safdarjung Tomb at Delhi Circle. On being pointed out by us in June 2012, the Circle removed it for replacement. The notice board had not been re-installed as of November 2012.

Similar discrepancy was noticed in the case of Sunehri Masjid near Red fort in Delhi Circle where Hindi and English signboards gave conflicting information about builder of the Mosque.



Signage showing that the mosque was built by Nawab Qudasia Begum, mother of Ahmed Shah | **Inventory showing that the mosque was built by Nawab Qudasia Begum, wife of Ahmed Shah** | **The Hindi sign board was removed after the discrepancy was pointed out**

Recommendation 10.2: *It is recommended that signage installation should be thoroughly reviewed. In our opinion, there should also be cultural notice boards in the local languages. At important sites, including World Heritage Sites, notice boards should be placed in major world languages. Similarly for Buddhist sites, notice boards should be displayed in relevant languages depending upon the visitors of the sites.*

10.3.2 Site Interpreter (Guide) Facilities at the Monuments

The sign boards at the monuments provided brief description of the monument. However, to understand the significant features and importance of the site, services of site interpreter (Guide) were required. It was even more important to have adequate guide facilities at complex sites that were spread out viz. Taj Mahal, Red Fort, Hampi, Ajanta Ellora caves. We noted that the ASI had no role in providing or monitoring guide facilities on these sites. The tourism departments of Centre and State Governments were providing guide licenses to the persons after analysing their knowledge of history and monuments. The AMASR Rules 1959 had provision for providing licence to guides by the ASI, however, no such licences were issued by the ASI. No documented reasons for this inaction were available.

The ASI decided (2006) to provide audio guide facility at the world heritage sites in different languages viz. Hindi, English, French, Spanish, German, etc. However, during the last six years, the ASI provided audio guide facility only in five world heritage sites viz. Agra Fort, Khajuraho, Sanchi, Qutb Minar and Red Fort that too in limited languages.

Recommendation 10.3: *The ASI in collaboration with the Tourism Ministry should devise a special program for training people from the local community as guides. Circle offices should provide an authentic version of narration of the sites which can be adapted and translated in various languages.*

Recommendation 10.4: *The ASI should assess the feasibility of designing specialised guided tour for specific/ group of monuments to cater to special needs of visitors.*

10.3.3 Availability of Publications on Sites

Authoritative maps, guidebooks and other publications provide a useful resource for enhancing understanding and interpretation of the monuments. To be useful for visitors, these should be available near the site. The publication Division of the ASI has been publishing various types of brochures, pamphlets, guide books on the various monuments and these were distributed to Circle offices for sale at the publication counters available at the monuments. The ASI earned ₹ 2.24 crore during the period 2007-08 to 2011-12 from sales at the publication counters.

We noted that there was no publication counter in any of the 12 ticketed monuments at the Bengaluru Circle. Even in the Delhi Circle, five ticketed monuments did not have any publication counter. The ASI HQ did not have complete information in respect of the total number of publication counters available. However, as per the information provided for eight Circles, there were only 37 publication counters. Absence of publication counters at each site led not only to loss of revenue but more importantly deprived the visitors of useful references about the monuments.

10.3.3.1 Inadequate Distribution of Publication Material

The ASI HQ did not have any mechanism for proper distribution of Publication material to the Circle offices. Record management was also poor.

We noticed that some publications were being sent to unrelated Circles without any justification. For instance at Agra Circle, instead of providing the literature material on the World Heritage sites in and around Agra Circle, the ASI HQ supplied the material on Mahabalipuram. As a result the material could not be used and was relegated to the store room. Similarly, in the Kolkata Circle, some publications were sent by ASI-HQ without any requisition from the circle. The excess books issued to Guwahati Circle were also found lying unutilised and damaged.

The ASI HQ did not ascertain the specific requirement of the Circle offices for distribution of the material. As a result, sale of the ASI publication remained low and in the absence of need assessment 308128 books were lying unused at the various publication counters. Details are given in **Annex 10.2**.

The ASI attributed the reasons for ad-hoc practices of distribution of publications to the shortage of staff. We find this reason unconvincing as there were no laid down procedures and instructions for distribution of publications.

10.3.3.2 Availability of Maps of the Sites

The ASI had sites which were spread over many acres. These included groups of monuments, forts and caves. At most of such sites including some World Heritage Sites, the ASI did not provide for any site maps to the visitors.

10.4 Involvement of Local Community

Heritage interpretation and education programmes among the people of the host community should encourage the involvement of local site interpreters. The programmes should promote a knowledge and respect for their heritage, encouraging the local people to take a direct interest in its care and conservation. Tourism and conservation activities should benefit the host community.[64]

We found that there were negligible efforts from the Ministry and the ASI to devise any special programmes to create public awareness and support. We found that due to the failure of the ASI to involve the local community in protection and conservation of these sites, in many places, the local community opposed the efforts of the ASI to maintain these sites. There was no formal forum of interaction with the local community and the Circle offices.

[64] International Cultural Tourism Charter of ICOMOS

10.5 Visitors Facilities at the Monuments

ICOMOS charter provided that conservation and tourism planning for Heritage Places need to ensure that the Visitor's experience would be worthwhile, satisfying and enjoyable.

To make the monuments visitor friendly, the ASI was expected to provide basic amenities viz. drinking water, toilets, ramps for physically challenged, notice boards in Braille language, etc. at the monuments. Further, the Persons with Disability (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995 provided for the provision of ramps in public buildings and adaptation of toilets for wheel chair users.

10.5.1 Status of Public Amenities

Joint physical inspection and available information at the Circles for 2461 monuments revealed that the ASI failed to provide the basic public amenities at its protected monuments as can be seen from the following table:

Table 10.2 Public Amenities at the monuments

Amenities	No of monuments in which facilities were not available	Percentage of non availability
Drinking water	1781	72
Toilets	2030	82
Wheel chairs	2247	91
Ramps	2293	93
Braille Sign Boards	2448	96
Complaint register	2268	92

Lack of these basic amenities, adversely affected the footfall at these sites and also reduced the quality of experience of the visitors. In addition, lack of facilities for differently able visitors constitutes a violation of the Persons with Disability Act 1995. Lack of ramps and wheel chairs at these monuments would also restrict access of these sites to such visitors. During our inspections we found very few sites which were "barrier free" for such special category of visitors.

10.5.2 Efforts of the ASI for Public Amenities

The ASI entered (January 2009) into a Memorandum of Understanding (MoU) with a non profit organisation '*Svayam*' and appointed them as their Access Consultant initially for three years. The NGO was to provide consultancy to the ASI (free of cost) for making all the monuments/sites accessible to people with reduced mobility in accordance with law and international standards and guidelines and specific indigenous factors.

In the first phase, the NGO was to carry out access audit in the heritage sites of New Delhi, Agra (Uttar Pradesh) and Goa and identify barriers to accessibility and recommend appropriate suggestions and strategies. Subsequently, the ASI was to draw a Joint Action Plan for each site to execute the recommendations of the NGO.

The NGO submitted the access audit reports of five monuments[65] in July/August 2010 to the ASI along with various suggestions.

We found that till December 2012, the ASI had not initiated any action on the recommendations of the NGO.

10.5.3 Lack of Approach Road to the Monuments

Joint physical inspection revealed that there were many protected monuments which were not easily accessible due to the lack of an approach road. The ASI did not initiate any remedial measures in co-ordination with the municipal authorities concerned to address this important issue.

In fact, in some monuments due to absence of regular physical inspection of the monument by the officials of the ASI information was unavailable at the Circle/ Sub Circle level. Some instances of the absence of approach roads are mentioned below:

Table 10.3 Monuments without approach roads

Sl. No.	Circle	Name of the monument
1.	Agra	Mound of Kachhwa, Mamirpur
2.		Baniyaki Barat, Lalitpur
3.		Temple Flat roofed, Urwara, Mahoba
4.		Ghuguwa Ka Math, Barua Sagar, Jhansi
5.		Kos Minar, Mathura
6.		Buddhist Vihar, Pakhnabihar, Farrukhabad
7.		Ancient site, Katarikhera, Farrukhabad
8.		Mound Sahegarh Khera, Aligarh
9.	Delhi	Nai Ka Kot
10.	Srinagar	Monolithic Shrine Khrew
11.		StupaTisseru (Leh)
12.	Ranchi	Jami Mosque, Hadaf
13.		Benisagar tank

[65] Etmad-ud-daulah, Agra, Mariam's Tomb, Agra, Agra Fort, Deeg Palace, Rajasthan and Purana Qila, Delhi

14.	Patna	Rock Temple at Kahalgaon
15.		Rohtas Garh Fort in Sasaram
16.		Pakka Masonary Fort in Bijaigarh, Sonbhadra
17.	Kolkata	Barkona Deul site at Malda
18.		Residency Cemetery, Babul Bona
19.	Guwahati	Grave of Mr BJ Stow
20.		Tomb of Lt. Cresswell

The Mirdha Committee in 1984 had stated that it is a sad fact that many important monuments remained inaccessible during the rainy season for lack of all weather roads. The ASI should make all its efforts to persuade the State Government to lay pucca road to monuments to facilitate their regular inspection all the year round.

However, even after a lapse of 28 years of this recommendation the position remained the same. There was no initiative from the Ministry to assess the need for a approach road and to take necessary measures with the State Governments at appropriate levels.

10.5.4 Facility of Online and Advance Tickets

Worldwide, the facility of advance online booking of tickets for sites frequented by international tourists is adopted as a best practice. Many countries have also introduced joint tickets at reduced price for a group of sites in a city/ across a region, to facilitate visitors.

The ASI earned revenue of about ₹ 400 crores during the last five years from the sale of tickets. A total number of about 1.65 crore foreign tourist visited the monuments during the period 2007-08 to 2011-12. However, the ASI did not explore the possibility of introducing the facility of online booking of tickets to encourage more visitors to the sites. This would also help in timely remittance of revenue in the government account. Even on the ticket counters, there was no facility of purchasing the tickets through the credit/debit cards.

Recommendation 10.5: *The Ministry and the ASI should introduce the online ticket facility for all ticketed sites across the country with necessary security controls at the earliest.*

10.6 Interpretation Facilities in the Museums

We noticed that the interpretation facilities in the museums were also inadequate as given below:

10.6.1 Non-installation of Kiosks

The Indian Museum entered (March 2010) into an agreement with National Council of Science Museum (NCSM) for the supply of display equipment including 18 kiosks at a cost of ₹ 1.81 crore. This amount included ₹ 30.32 lakh as consultancy fee charged by NSCM for developing multi media kiosks. As per the terms and conditions the entire contract amount of ₹ 1.81 crore was paid by the museum in advance in favour of Science City on 31 March 2010. The scheduled date of completion of the project was December 2010, including timely submission of content and photographs to be displayed in the kiosks by the museum.

We noticed that equipment worth ₹ 22.18 lakh (excluding the software purchased) was lying in custody of the Science City, NCSM and Birla Institute of Technology Mission (BITM). The warranty period of some of the equipment *had* expired. NCSM stated that despite several reminders and meetings with the Indian Museum officials they had not furnished any data and photographs required for developing the Kiosks. Moreover, Director Science City stated that due to absence of data from the Indian Museum it would not be possible for them to complete the project since the vendors engaged by the NCSM had already been served termination letters.



Equipment lying in Indian Museum

Thus, failure on the part of the Indian Museum to provide the requisite data and photographs resulted in non installation of the Kiosks leading to non enhancement of public awareness.

CHAPTER – XI

Governance and Insensitivity to Red Signals

The functioning of the Ministry and its subordinate organisations were reviewed by external groups and authorities on multiple occasions. Parliamentary Standing Committee on Transport, Tourism and Culture also commented on the poor performance of the ASI and the National Museum and issues related to heritage conservation, several times.

Other authorities including the C&AG, Supreme Court and High Courts of India also took cognisance of the various issues in their reports/orders.

We noted that the Ministry and its associated organisations exhibited insensitivity towards these red signals. No major corrective actions or change in approach was noticed to rectify the deficiencies. Even where some action was initiated, it lacked the organisational will to be completed in a time bound manner. We analysed some of the recommendations made by these Committees/Groups and the action taken by the Ministry as of January 2013.

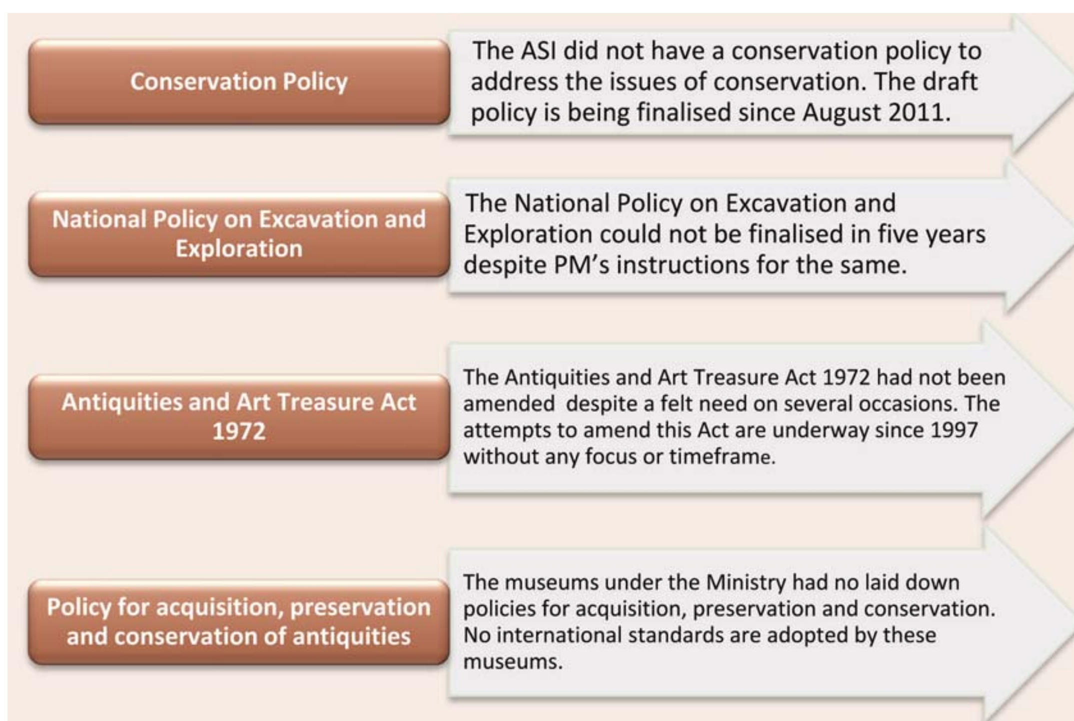
11.1 Ineffective Governance and Stewardship of Ministry

The mandate of the Ministry of Culture is to preserve and promote all forms of art and culture. In order to achieve this mandate, the Ministry undertakes maintenance and conservation of heritage, historic sites and ancient monuments through the ASI. Similarly, the Ministry also controlled some of the museums which had valuable collections. On the following issues, we found that the role of the Ministry was deficient:

11.1.1 Inadequacy of Policy Making

As pointed out in proceeding chapters, several organisations were working without adequate policy, legislation or standard practices. The inadequacy of policy affected the efficient functioning of these organisations for years. Yet we found no efforts from the Ministry to ensure timely updating of policies and due monitoring for the same as can be seen in the **Chart 11.1** below:-

Chart 11.1 Absence of proactive approach for finalisation of the Policies



However, the Ministry failed to monitor and take suitable action to accelerate the policies/legislation. Several agencies including the courts pointed out severe shortcomings in the functioning of ASI and museums and yet, the ministry took no note to improve the Governance at its level.

11.1.2 Improper Financial Management

The Ministry made budgetary allotments to the ASI without assessing the fund requirements of the ASI. No instructions were given to assess the requirements for conservation works and no proactive attempts were made to seek funding from sources other than Consolidated Fund of India.

The revenue generation efforts of ASI remained limited largely to ticketing and fees for shooting at the sites. No efforts or guidance was provided by the Ministry to adopt international best practices of revenue generation through monuments by way of souvenir shops, customised tours and provision of other tourist facilities. In fact, even within the existing modes, attempts for modernisation through online ticketing or regular revision in fees for shooting were not found.

The Ministry provided no leadership in any of these areas. The monuments constituted national assets but their revenue potential had not been recognised or realised.

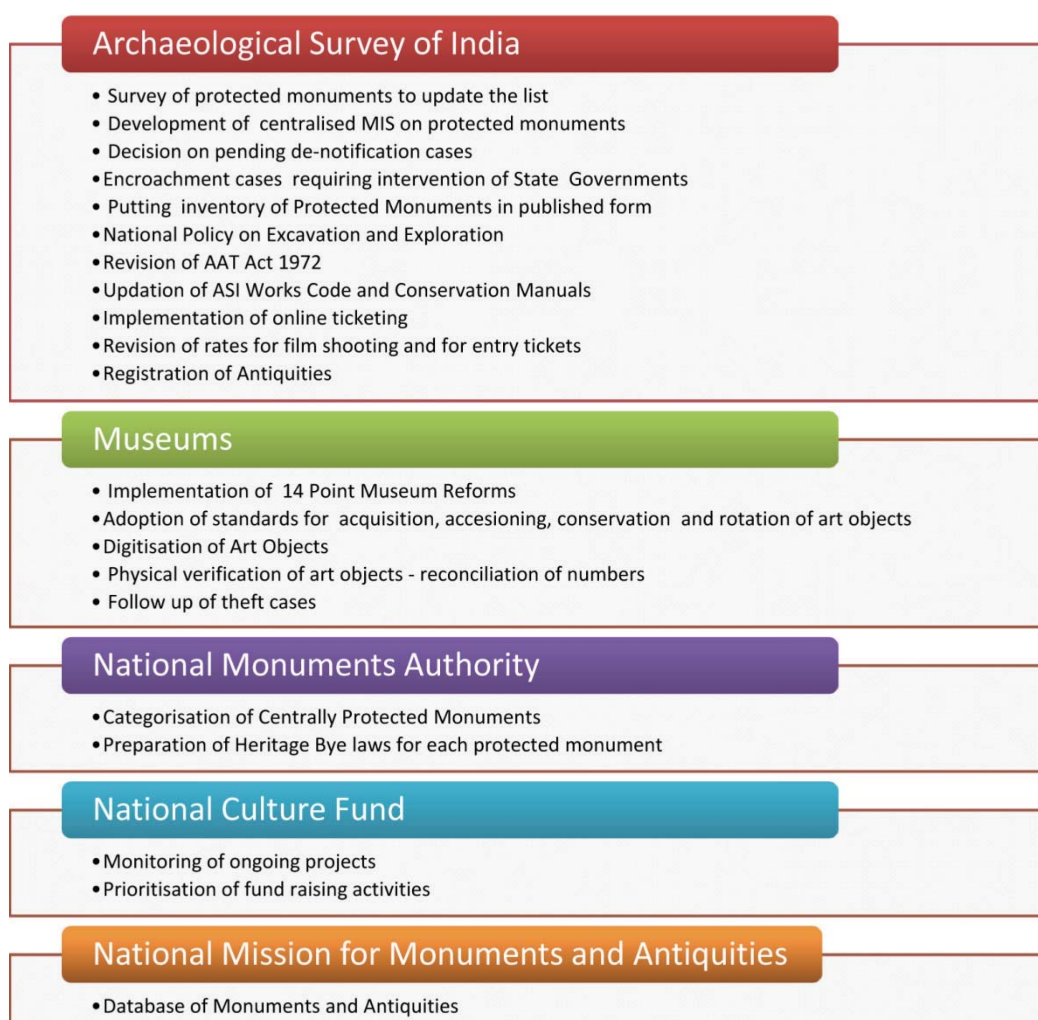
11.1.3 Inadequate MIS and Monitoring

The Ministry did not have any information or MIS at its own level and all questions and issues related to the organisations were simply forwarded to these organisations to handle. In effect the organisations functioned as long arms of the Ministry. We did not notice any monitoring of organisations like National Mission of Monuments and Antiquities for the timely progress of work. Many of the initiatives and projects taken up by agencies covered under this audit were lying incomplete for decades and the Ministry was not monitoring the same on periodic basis. Interestingly, whenever issues of neglect of a particular site or monument were raised through a Parliamentary Question, VIP reference or experts, the Ministry's efforts remained limited to that very site rather than looking for more systemic and process based changes for all such sites.

Even in case of individual sites, Ministry's interventions and assurances were found largely ineffective as is evident in the case of Kanaganahalli **(Refer Case Study 6)**.

A list of incomplete projects requiring monitoring by the Ministry is as follows:

Chart 11.2: Incomplete Projects/ works lacking monitoring of the Ministry



11.1.4 Insensitivity to Red Signals

There was no monitoring by the Ministry for action taken on the recommendations of various expert committees, audit reports and court rulings. Despite serious concern being raised on some issues from all forums, no concrete action was visible from the Ministry to rectify the shortcomings. Most of the concerns remained alive even after multiple red signals over the years. The details are given in succeeding paragraphs.

We found the guidance and instructions coming from the Ministry to these attached, subordinate and autonomous organisations random and conflicting. The documentation of instructions was incomplete and on many crucial aspects of functioning, there was no guidance from the Ministry. This had a trickledown effect on the efficiency and effectiveness of these organisations.

The Ministry replied (June 2013) that Central Advisory Board on Archaeology, headed by the Minister of Culture makes recommendations on conservation and maintenance of centrally protected monument. The Ministry provides guidance on all policy matters which are implemented by the ASI and the Ministry also monitors the activities of the ASI on all important matters on regular basis. However, the position of incomplete projects pointed towards ineffectiveness in the Ministry's monitoring. There is no system of regular reporting on pending issues/projects from various organisations to the Ministry. Further, the absence of a conservation policy and a national policy on excavation and exploration does not support the Ministry's reply.

11.2 Action on Recommendations of Various Reports

Table 11.1 Details of the various committees for evaluation of the ASI

Name of the committee	Reason of formation	Chairman	Report/ recommendation given in
The Expert Group on Archaeology	To carry out a professional study of the steps need to be taken and to prepare an overall plan of action in the matter of preserving India's historical monuments in the light of multi-dimensional factors responsible for their damage, especially environmental pollution and vandalism	Shri Ram Niwas Mirdha, Member of Parliament	1984

Name of the committee	Reason of formation	Chairman	Report/ recommendation given in
Parliamentary Standing Committee on Transport, Tourism & Culture's report on Functioning of the ASI		Shri Nilotpal Basu, Member of Parliament	2005
Committee appointed by Ministry of Culture	To analyse the impact of amendment to the AMASR Act 1958 including the impact of the AMASR (Amendment & Validation) Ordinance 2010.	Shri M. Veerappa Moily, Union Minister of Law and Justice	2010

It was noticed that the ASI/the Ministry failed to implement, on most issues, the recommendations of the Mirdha Committee in 1984. Similar matters were raised again by the Parliamentary Standing Committee in 2005 i.e. after a gap of more than 20 years. Most of these issues still remain unresolved:

Table 11.2 Details of the recommendations of various committees

Topic	Mirdha Committee(1984)	Parliamentary Standing Committee (2005)	Moily Committee (2010)
Changes in organisation of the ASI and the Legislation	The ASI should not be considered as a branch of public administration but should be treated as an academic institution with highly specialised duties and be accorded the status of scientific and technical institution enjoying	The Committee was constrained to note that no concrete action was taken by the Ministry and the ASI which amply indicated the administrative apathy towards the whole issue of implementation of the notification declaring the ASI as a scientific and technical institution. The Committee regretted that no internal exercise was undertaken by the Ministry and the ASI for availing the benefits and	The Act has not been able to adequately respond to the rapid growth in population and the attendant urbanisation across India. It has been ineffective in preserving our ancient monuments. An ineffective law has been

Topic	Mirdha Committee(1984)	Parliamentary Standing Committee (2005)	Moily Committee (2010)
	autonomy in its functioning. Though the notification for the ASI declaring a Scientific and Technical Institution was issued in 1990, it was never implemented	privileges as a Science and Technology Department.	compounded with the lack of manpower and resources of the ASI.
In 2012 we found that the ASI continued to function as a regular attached office of the Ministry. There was no move to confer the status of a Scientific Department to the ASI.			
Excavation and Exploration	• Lack of strategy for Exploration & Excavation • Not much has been done for historical period and pre history of India • Multi disciplinary work is needed for understanding the parameters of Stone Age. • At least 25*percent* of the ASI's budget should be utilised for Excavation and Exploration activities. • Publication of reports should be expedited.	• The ASI should strictly adhere to the criterion fixed for selection of Excavation of sites. Further, decisions for Excavations should be made on the basis of proper scientific and technical appraisal and no extraneous factors should go into the decision making. • The ASI should ensure that officials engaged in a particular Excavation work were not transferred till such time that they complete the Excavations and submit their reports.	• The reservation of a certain percentage of the estimated cost of large projects could be mandatory requirement so that archaeological documentation is done on a contract basis. This is the practice followed by several countries and results in the rapid execution and publication of focused archaeological works.

Topic	Mirdha Committee(1984)	Parliamentary Standing Committee (2005)	Moily Committee (2010)
In 2012, we found that expenditure on Excavation activities was just about one *per cent* of the ASI's budget. There were significant delays in report writing and publication. Officers were being transferred before completion of Excavation report and there was no specific planning or direction for the Excavations being taken up by the ASI (Details in Chapter 5)			
Conservation of Monuments	• Annual conservation programme should be specific purpose wise like a plan for the Kos Minars etc. • Important monuments should be identified for thorough conservation including environmental conservation on an integrated development basis. • There should be a new manual for conservation works and ASI should have its own schedule of rates. • Maintenance of Log Book of the monument with complete details of the work carried	• The ASI informed the Committee that a comprehensive conservation manual would be compiled during the 10th Five Year Plan. • More amounts should be spent on conservation/preservation of the sites in comparison to site development/ beautification etc. • The ASI should treat both ticketed and non ticketed monuments equally and efforts should be made for integrated infrastructure development and conservation/ preservation of all monuments/sites with encompassing facilities for tourists.	• The large amount of conservation work confined to WHS and ticketed monuments. • There are several hundred monuments which have not received a single rupee towards conservation in the last 20 to 30 years.

Topic	Mirdha Committee(1984)	Parliamentary Standing Committee (2005)	Moily Committee (2010)
	out should be properly recorded for future references. • Need for a special cell for research in archaeological conservation		
In 2012, we found that there were no integrated/ category wise conservation programs for monuments. No logbooks were being maintained by the Circles on works taken up on each monument. The Conservation Manual was not updated and the ASI had not developed its own Schedule of Rates. The ASI continues to rely on the Manual published by Sir John Marshall.There was no special cell for research and Archaeological Conservation. The position of visitor amenities was far from satisfactory even on World Heritage Sites. (Details in Chapter 3 and Chapter 10).			
Security of Monument	The ASI should have at least 9000 monument attendants and they should have a security force of its own	• 10000 posts of monument attendants. • Expenditure on Security i.e. CISF and SIS should be borne by the Ministry of Home Affairs and suitable proposal should be submitted	• While expressing concern on the encroachment and destruction of monuments, the Committee mentioned that the numbers of disappeared monuments were larger than mentioned by the ASI i.e. 35.

Topic	Mirdha Committee(1984)	Parliamentary Standing Committee (2005)	Moily Committee (2010)
In 2012, we found that majority of the ASI monuments were still without a fulltime guard. Monuments were increasingly falling prey to encroachments for want of adequate security arrangements. (Details in Chapter 9)			
Human Resource Management	• Upgrade the present post of Directors to JDGs and the post of SAs be changed to Directors • Staff at Circles should be suitably increased which includes the technical as well as administrative staff • HQ should have a Public Relation Officer • More posts were recommended in the engineering cadre to properly handle the conservation and preservation of monuments	The ASI still felt shortage of manpower in the Conservation cadre and also in the Horticulture cadre to cope up with the requirement	The Committee mentioned that in several cases, threats to the monuments have been ignored by their institutional guardian, the understaffed and underfunded the ASI. • There are situations where the CAs are managing up to 80 monuments and hence they cannot be expected to visit /inspect such a large number of monuments at any reasonable frequency.
In 2012, we found that the ASI was facing acute shortage of staff. There were alarming shortages of technically competent staff for taking up conservation work. Some specialised conservation units like Underwater Archaeology were defunct for want of manpower. (Details in Chapter 4).			

Besides the above points, there were other issues that were pointed out by these Committees as detailed below:-

Topics	Recommendations of Ram Niwas Mirdha Committee
Inspection of the Monuments	Each monument should be inspected by one of the officers of the Circle and the Directorate must enjoin the Directors to inspect at least 50 monuments in a year. Inspection and Conservation notes should be prepared for each monument and be separately filed in a guard file.
Availability of Site Plans	Attendant should have a Site Plan in his possession so that he can report any threat to the ASI's land by way of encroachment.
Documentation Centres	There should be 2-3 documentation centres having all the details of the monuments including relevant photographs, drawings etc for the interested scholars.
Public Amenities	More monuments should be ticketed and the price should be increased. Public amenities, flood lighting etc should be done and maintained by tourist departments in consultation with the ASI
We found that none of these recommendations were carried out or even considered at higher level. Lack of inspection of monuments and documentation continued to be areas of concern. The basic documentation like site maps/ plans was not available at Sub-Circle level in most cases. (Details in Chapter 2 and 10)	

Neither the ASI nor the Ministry could provide us documentation and assurance that these issues were considered and some changes were brought about on the basis of these recommendations. Our audit at the field level confirmed that most of the issues remained relevant and unchanged even now.

11.2.2 Recommendations of the Committees on the National Museum

We also noticed that even the National Museum showed insensitivity to the red signals. An Expert Committee for the purpose of ***"Comprehensive Scientific and Physical Verification of Art Objects of National Museum*** was appointed under the chairmanship of Shri Varadarajan in 1999. The report was prepared by the Committee and submitted in the year 2004. Further in 2011, a Parliamentary Standing Committee chaired by Shri Sitaram Yechury, also pointed out the lapses in the functioning of National Museum.

Both reports submitted in 2004 and 2011 were having common issues which were not resolved till the completion of the Audit (November 2012). Some of them are as follows:

Topics	Recommendations of Varadarajan Committee in 2004	Recommendations of Yechury Committee in 2011
Documentation	Entire holding should be digitised and computerised by December 2005	There is a minimal use of IT. Digitisation must be considered for expeditious implementation
Physical verification	20 *per cent* of the objects of each section must be verified each year so that all objects were completely verified in a five year cycle.	Finds it hard to believe that no verification of artifacts had been done since 2003. The Committee fears that when the verification process is taken up some of objects may be reported missing
The physical verification was not carried out after 2003		
Security	Security must be under one umbrella and managed by one agency	Make use of the best technology to safeguard the museum
Display	Display of the galleries needs to be changed periodically	Yearlong display schedule may be drawn up and publicised widely
No specified display schedule was drawn up (Details in Chapter 6)		
Manpower	Critical vacancies must be filled without any further delay	Make the post of DG more attractive. Lack of commitment of the Ministry in filling up posts. Create posts of ADG and JDG.
No posts of ADG and JDG were sanctioned and filled up. The manpower crunch was noticed during the audit also. (Details in Chapter 8)		

Topics	Recommendations of Varadarajan Committee in 2004	Recommendations of Yechury Committee in 2011
Acquisition	Art Purchase Committee be reconstituted and should start functioning from April 2004	Reasons for the defunct acquisition committee may be looked into and steps be taken to constitute the committee at the earliest
The Art Purchase Committee was still defunct and no concrete efforts were made to reconstitute the same. (Details in Chapter 6)		
Closure of galleries		Out of 26, 7 galleries were closed and the reasons were not convincing. No laid down guidelines for renovation of galleries
Maintenance of building		Performance of CPWD may be closely monitored and if required, the maintenance may be awarded to some other specialised agency
Signage		Signage and labels were unattractive and too small in size and find errors in translation
Central Asian Objects (CAA)	Suitable decision for 700 CAA objects lying in V&A Museum, London should be taken and digital catalogue be obtained from them	
No efforts were made by the National Museum to contact V&A Museum, London to search for the details of the 700 CAA objects.		
Gift shop	It must be plentifully stocked with attractive replicas	
Non antiquity objects	Non antiquity objects could be transfer to NGMA or crafts museum	

11.3 Court Rulings for Monuments

Various courts across the country had also taken note of the issues related to heritage conservation and functioning of these organisations. We noted that there were instances where no action was taken by the ASI even after the directives of the Hon'ble Supreme Court of India and the High Courts of the States. Some of the illustrative cases were as follows:

11.3.1 No action on Supreme Court Judgments

a) On the appeal of the ASI, the Supreme Court in 2004 passed a judgement[66] through which the notifications issued by Government of Karnataka in 1976, declaring 43 centrally protected monuments as Karnataka Wakf Board properties, were annulled. However, instead of taking steps to cancel the notifications, the ASI requested the Government of Karnataka for a joint survey of these monuments to determine the status of monuments from 2008. The joint survey had not been conducted till January 2013. The Government of Karnataka had further notified another six monuments at Bidar, Belgaum and Gulbarga as Wakf properties in August 2005, i.e. after the Supreme Court judgement of 2004. No action was taken by the Ministry or the ASI in this regard.

b) For the celebration of local festivals near the Tenkailasanatha Temple, a centrally protected monument in Trissur circle, people used to burst fire crackers which were destroying the mural paintings of the temple. In 2005, the Supreme Court directed that the chemical composition for each fire crackers should not result in noise levels exceeding the limit of 125 decibels at the rituals during festival season. However, the ASI did not put any system in place to coordinate the issue with District Authorities. The ASI had no mechanism of its own to ensure that the Supreme Court directions were adhered to. We found that fire crackers being used in the function were still damaging the roof of the protected monument.

11.3.2 No Action on the Judgments of High Courts of States

The ASI was unable to remove encroachments from its protected sites despite court judgments. Absence of cooperation from District and State Authorities was cited as a reason by the ASI. However, we noted that it had not taken up this matter at the Ministry's level for a long term solution. Some illustrative cases are as follows:

[66] CA No 16899/96

a) 66 cases of unauthorised construction in the protected area of Jaisalmer Fort, Rajasthan could not be removed despite the judgment of the Rajasthan High Court in February 2004.

b) The High court of Ahmedabad orders, for removal of encroachment at the Ancient site, Gohilwad Timbo, Amrali, Vadodara Circle, could not be implemented.

c) In 2002, the High Court of Delhi directed the Central Government to review its notification dated 16 June 1992 relating to its definition of prohibited and regulated areas and the requirement of permission from the ASI for construction in the regulated area. The High Court also opined that prohibition of construction must not be left to an inflexible rule of thumb but must be arrived at after a conscious and objective application of mind. However no such review has been carried out or even started as of January 2013.

11.4 Insensitivity to Audit

The ASI received its budget from the Consolidated Fund of India and therefore, we conducted regular transaction audit of the Headquarters of the ASI and the Circles and Branches. We noted the persistence of irregularities.

We had also conducted a review of the "Preservation and restoration of Art Objects" related to Indian Museum, Victoria Memorial Hall and Asiatic Society Kolkata, published in C&AG's report No 4 of 2005 (Civil). However during this Performance Audit we were constrained to note that most of the irregularities and shortcomings were persisting.

11.5 References from People

Cases were also noticed where people's representatives, conservationists and eminent persons pointed out towards serious lapses in the functioning of the ASI. The ASI did not take any action in most of the cases even to ascertain the facts. Some such illustrative cases were noticed during the test check of records:

a) The ASI carried out a joint survey with the State authorities to develop Chandramouleshwra temple, Unkal in Dharwad Circle as a tourist place. A rehabilitation plan amounting to ₹ 14.75 crore was made after conducting the survey. This would be shared in the ratio of 37:63 between the Government of Karnataka and Government of India. It was revised to 50:50 in August 2010. As no progress was made in this regard, Shri Prahlad Joshi, Member of Parliament requested the Prime Minister's office to take appropriate action in this regard in September 2011. No further action was taken on this issue till completion of Audit (December 2012).

b) Minister for Rural Development, Government of India informed (April 2012) the Minister of Culture regarding the conditions of the Buddhist site 'Kanaganahalli'. He mentioned that the "protection of the monument was only on paper and the lump of the head of the woman was vandalism masquerading as archaeological conservation". He stressed for the establishment of the Site Museum, documentation of each and every piece of stone and for carrying out the repair work in the most sensitive and scientific way. No action was taken despite his intervention and subsequent visit. We found the site lying neglected. (Refer **Case Study No 6**).

c) Similar observations were made by the Minister for Rural Development, Government of India regarding the poor condition of the Tomb of Hasan Shah Suri and Sher Shah Suri at Sasaram, Rohtas in Patna Circle. He pointed out the poor condition of the baoli, garbage and defaced walls and mentioned that the maintenance was 'atrocious'.

The ASI failed to ensure proper compliance with the recommendations of Expert Groups and Parliamentary Committees. As a result, the ASI continued to function ineffectively, without adequate financial and human resources to carry out its mandate. The deficiencies in the ASI can largely be contributed to the Ministry's insensitivity towards these red signals.



CHAPTER – XII

Conclusion

This Performance Audit was taken up on the occasion of ASI's 150th anniversary. Several aspects of ASI's objectives, processes and results have been reviewed. The most significant failure of ASI related to its core function of field archaeology that included excavation, survey and publication of excavation reports. Presently, ASI's expenditure on excavation is less than one per cent of its total budget. We noted that ASI has no policy governing the selection of excavation sites, timeframes for the completion of excavations and the publication of its findings. As a result, even decades after the commencement of major excavations, viz. Dholavira, Sanghol, Rakhigarhi, Sravasti, Mathura, the excavation reports have not been published. In several cases, the selected archaeologists leading these excavations are no longer with the ASI. In some cases, the archaeologists had died. As a result, excavated antiquities have not been accounted for and in some cases even the excavation sites had gone untraceable.

We noted that the planning function was largely neglected. Exploration and preservation were crucial functions of the ASI; however, a comprehensive policy for these areas had not been formulated. As a result, conservations efforts were grossly inadequate. We noted that the ASI still depended on a manual published in 1923 for most of its field activities. This document was not updated. Most of ASI's important publications, for instance, 'Indian Archaeology a Review' were pending for years.

To ensure effective protection of monuments and sites it was imperative to update policies, publish inventories and fully document monument details. However, these activities had not completed by the concerned entities. The National Mission of Monuments and Antiquities had also failed to fulfil its purposes in a time-bound manner. This Mission lacked direction, vision and appropriate strategy.

In the context of these weaknesses, encroachment of monuments and unauthorised constructions were widespread. Further, in the absence of comprehensive planning and organisational weakness, there was no coordination among the three major wings of ASI, responsible for structural, chemical and environmental conservation.

Success of conservation works was left largely to individual initiatives and an overall departmental perspective was completely missing.

Regarding the financial management of ASI, we noted that the funds allocated to ASI for its mandated activities were grossly inadequate; however, there was little initiative on its part or the Ministry of Culture to enhance the budget allocations or explore revenue opportunities. The manpower management was marked by critical shortages leading to negligible supervision of works and inadequate security.

The ASI was unable to implement the provisions of the Antiquities and Art Treasure Act effectively and the incidence of an illegal export of antiquities was rampant. The proposed legislation amendments to this Act were pending for years.

We observed significant shortcomings in the functioning of the museums. The museums did not have any benchmarks or standards for acquisition, conservation or documentation of the art objects possessed by them. The mechanism for evaluation of acquired objects to verify their genuineness was absent in all the museums audited by us. There was no mechanism to assess the genuineness of artifacts. Poor documentation of the acquired artifacts and the failure to introduce the digital technology for documentation coupled with the absence of physical verification made the artifacts vulnerable to loss. The security system at the museums provided a grim picture in the absence of effective surveillance systems at the sites.

We also noted that many shortcomings relating to the functioning of the ASI had been highlighted through the recommendation of various expert/Parliamentary committees. However, we also noted with distress that these red flags were largely ignored by the Ministry of Culture. In our opinion urgent measures were required to completely overhaul the ASI in light of its mandate and to restore this organisation to its distant former glory.

New Delhi
Dated : 2 August 2013

(ROY MATHRANI)
Director General of Audit,
Central Expenditure

Countersigned

New Delhi
Dated : 5 August 2013

(SHASHI KANT SHARMA)
Comptroller and Auditor General of India



ANNEX



Annex 1.1
(Refer Para 1.1)
Details of Units Audited and their Functions

Sl. no.	Name of the Museum	Functions
1.	Archaeological Survey of India (ASI)	The objectives of the ASI included: • Survey of archaeological remains and excavations; • Maintenance and conservation of Centrally Protected Monuments and Sites; • Development of epigraphically and numismatic structure; • Setting up and re-organisation of Site Museums; • Conducting expeditions abroad; and • Training in Archaeological and publication of technical study reports and research works.
2.	National Museum, Delhi (NM)	The National Museum, a subordinate office of the Ministry, was set up in 1949 and is the largest museum in the South Asian Region. There were more than 2.06 lakh works of exquisite art and antiquity beginning from the prehistoric stage of human existence, covering more than 5,000 years of Indian civilisation and cultural heritage. The Museum was involved in important work of acquisition and conservation of art objects, organising exhibition and educational activities, production of replicas of masterpieces of India sculptures, audio visual and other educational programmes, to train the museum staff of National Museum and other Museum /institutions in the latest technology of conservation, bringing out publications of art and culture. There were 11 collection departments related to different fields of antiquities like Archaeology, Arms and armour, Decorative Art, Central Asia, Painting, Pre Columbian and Western Art, Manuscript, Jewellery, Anthropology, Numismatic and Epigraphy which were displayed in 26 galleries.
3.	Indian Museum, Kolkata (IM)	The IM was founded in 1814 and is the largest and the oldest institution of its kind in the Asia Pacific Region. The Museum was a repository of both Indian and trans-Indian objects. It had six sections comprising of 35 galleries of cultural and scientific artifacts
4.	Victoria Memorial Hall, Kolkata (VMH)	The VMH was established under the Victoria Memorial Act, 1903 and was declared as of national importance in 1935. VMH had a collection of sketches and drawing, coins and

		medals, arms and armour, books and manuscripts, etc. that represented and drew our attention visually to the history of pre-camera days.
5.	Asiatic Society, Kolkata (ASK)	The ASK was founded in 1784 by Sir William Jones and was declared as an institution of national importance in 1984. ASK has large collections of paintings, manuscripts, coins etc. and served the readers, researchers and visitors of different parts of India and abroad.
6.	Salar Jung Museum, Hyderabad (SJM)	SJM was established in 1951 and was declared as an institution of national importance in 1961. It has a collection of about 48000 objects, 40528 books and 8556 manuscripts. 14607 objects and all the books and manuscripts are on display through 38 galleries and a Library. The major portion of the collections of the Museum was acquired by Nawab Mir Yousuf Ali Khan, popularly known as Salar Jung III, the then Prime Minister of the Rulers of Hyderabad State and hence the Museum was named after him.
7.	Allahabad Museum, Allahabad (AM)	The AM came into being in 1931 and was declared as of national importance in 1985. The museum has collection of 70121 objects and 18 galleries to display their collection. The Museum has impressive collection of the Gupta period, early medieval period, of sculptural master pieces and organised seminars, exhibitions and other educational activities.
8.	Asiatic Society, Mumbai (ASM)	Bombay Branch of the Royal Asiatic Society was founded in 1826 merging the Literary Society of Bombay founded in 1804 with the Royal Asiatic Society of Great Britain and Ireland with the objective of encouraging the study of and research in the languages, philosophy, arts and natural and social sciences. The Sopara (Buddhist) Relics and a large stone coffer containing eight unique Buddhist Bronzes, Relic casket of copper, silver, stone crystal and gold along with some gold flowers, fragments of a begging bowl and 11830 antique coins were in the possession of the ASM.
9.	Chhatrapati Shivaji Maharaj Vastu Sangrahalaya, Mumbai (CSMVS)	Earlier known as Prince of Wales Museum, it was set up in the beginning of 20^{th} century to honour the visit of King George V to India. The Museum has 50000 exhibits of ancient history as well as objects from foreign lands. It has some of the finest collections featuring ancient Indus Valley artifacts and also relics from Gupta period. This Museum is a private organisation but receives one time grant under the scheme 'Strengthening of museums in Metro Cities' from the Ministry.
10.	National Culture Fund, Delhi (NCF)	The Government of India in 1996 set up 'National Culture Fund (NCF)' with a view to enable the participation and

		involvement of the Corporate Sector, NGO's, State Governments, Public Sectors and individuals in the task of promoting, protecting and preserving India's natural, cultural and intangible heritage. NCF was given an initial corpus of ₹ 19.50 crore. NCF was to generate and utilise funds for conservation, maintenance, promotion, protection, preservation and upgradation of monuments protected or otherwise. Besides financing heritage conservation projects, other objectives of NCF included imparting training to staff and specialists at all levels in the field of conservation of both tangible and intangible heritage. It was noticed that due to the lack of coordination between the Donors, the NCF and the implementing agency (ASI), projects were invariably delayed.
11.	National Mission on Monuments and Antiquities, Delhi (NMMA)	In 2003, the Prime Minister announced setting up of a Mission to prepare comprehensive documentation and create a database. Subsequently in 2007, National Mission for Monuments and Antiquities was launched. The Mission was established for five years to document and prepare suitable database of unprotected built heritage, sites and antiquities through published and unpublished resources and antiquities.
12.	National Monument Authority (NMA), Delhi and Competent Authorities	By amending the AMASR Act of 1958, a new AMASR (Amendment & Validation) Act 2010 was enacted. This Act authorised Government of India to constitute National Monument Authority (NMA) and Competent Authority to scrutinise the proposals for issue of 'No Objection Certificate' for carrying out the repair and renovation in the prohibited area (100 meters from the protected area) and for construction and re-construction in the regulated area (200 meters from the prohibited area). Earlier this work was carried out by the Circle Offices. NMA was also required to prepare and approve the heritage bye-laws for all the centrally protected monuments and to present them in Parliament which would help in assessing the impact of any construction, specially the large scale projects on the protected monuments which were of national importance.
13.	National Research Laboratory for Conservation (NRLC)	The National Research Laboratory for Conservation of Cultural Property (NRLC), established in 1976, was a scientific institution dedicated to the Conservation of Cultural Heritage. NRLC carried out research in materials and methods of conservation, disseminated knowledge in conservation, imparted training in curative conservation, developed, and implemented programs in the field of preventive conservation. NRLC developed and standardised methods for the conservation of different types of objects and for the

		analytical study of cultural property. The aims and objectives of the laboratory were as follows: • Research for the development of better methods of Conservation. • Technical studies of Art and Archaeological Materials. • Technical Assistance to Museums, Archaeological Departments and other Institutions. • Training, Documentation, Publications, International Liaison, etc. In 1986, a Regional Centre of NRLC for the Southern region, named Regional Conservation Laboratory (RCL) was established in Mysore, Karnataka. Plans to establish regional centers in the North East, West, East and Central India was also underway.

Annex 1.2
(Refer Para 1.2.1)

Details of Provisions of the AMASR Act and the AAT Act

The Ancient Monuments, Sites & Remains Act 1958 and the AMASR (Amendments & Validation) Act 2010

Notification for protection of Monument

- The Central Government by issue of a gazette notification may declare a monument to be of national importance. It should be in existence for not less than hundred years.
- The Central Government shall maintain every monument which has been acquired.

Construction in and around the Protected monument

- No person, including the owner or occupier of a protected area, shall construct any building within the protected area or carry out any mining, quarrying, excavating, blasting or any operation of a like nature without the permission of the Central Government.
- No person shall carry out any construction in the prohibited area (100 meters from the protected area) and can carry out repair/renovation only after the permission from the Competent Authority on the recommendations of the National Monument Authority.
- Permission from the Competent Authority on the recommendations of National Monument Authority is required to carry out construction/reconstruction in the regulated area (200 meters from the prohibited area).
- Central Government on the recommendations of NMA can increase the prohibited/regulated area.
- Construction without the permission of the competent authority shall be punishable with imprisonment not exceeding two years or with fine up to Rupees one lakh or both.
- The Central Government may declare by notification that, if it is of the opinion, the monument or archaeological site or remains, has ceased to be of national importance.

Excavation in protected and unprotected area

- Only authorised person with licence from the DG, ASI, can undertake excavation work at the protected area.
- The excavation work shall be conducted under the supervision of the Director named in the licence, who shall be present at the site at least three fourth of the period of operations.
- The licensee shall submit a summary report after completion of the excavation work to DG and if the period is more than three months then a quarterly report has to be submitted. DG may publish these reports in the reviews etc. The licensee shall submit a report in the prescribed form as soon as practicable.
- Excavation in unprotected area cannot be done without the permission of the Central Government.
- For moving any antiquity, permission from DG ASI should be sought three months before the proposed date of the moving.
- After the issue of notification, no person other than archaeological officer shall undertake any mining or construction in a prohibited area and in a regulated area except with the terms & conditions of the licence for such work.

The Antiquities and Art Treasures Act, 1972

The Central Government, by notification, can specify the antiquities that are required to be registered. Every person who owns controls or possesses such antiquity should register the antiquities and obtain a certificate. Transfer of ownership of such antiquities should also be intimated to the ASI.

The Central Government can also compulsorily acquire any antiquity or art treasure after paying due compensation to the owner.

The Central Government can enter and search any place and seize any antiquity or art treasure in respect of which provisions of the Act have not been complied with

ASI is the final authority to declare whether any object is an antiquity or not.

No person, other than the Central Government or agency/authority authorised by the Central Government, can export any antiquity or art treasure.

No person can carry on business of selling or offering to sell antiquity without a licence issued for the purpose under Section 7 of the Act.

Annex 1.3
(Refer Para 1.3.5)

Details of Monuments Physically Inspected

Sl. No.	Name of the circle	No of monument physically inspected
1.	Agra	61
2.	Aurangabad	39
3.	Bengaluru	116
4.	Bhopal	111
5.	Bhubaneswar	20
6.	Chandigarh	60
7.	Chennai	105
8.	Dehradun	32
9.	Delhi	121
10.	Dharwad	121
11.	Goa	21
12.	Guwahati	38
13.	Hyderabad	44
14.	Jaipur	122
15.	Kolkata	83
16.	Lucknow	90
17.	Mumbai	27
18.	Patna	125
19.	Raipur	24
20.	Ranchi	11
21.	Shimla	14
22.	Srinagar	41
23.	Trissur	16
24.	Vadodara	213
Total		**1655**

Annex 2.1
(Refer Para 2.5)
Details of Missing Monuments

Name of the circle	Name of the state	Number of monuments	Name of the monuments
Agra	Uttar Pradesh	7	(i) Site of Aonla railway station, Bareilly (ii) Tomb of Lt. Col. John Guthrie, in mud fort, Farrukhabad (iii) Ancient sculpture, carving, images, basrelics, inscriptions, stones and like objects, Mathura (iv) Portion of Katra Mound which are not in the possession of Nazul Tenants on which formerly stood a temple of Keshav Dev which was dismantled and the site utilised for the mosque of Aurangazeb, Mathura (v) Monument of Kila Chandpur Fort, Bijnor (vi) Monument near Kila railway station, Hathras (vii) Old British cemertery, Bijnor
Aurangabad	Maharashtra	5	(i) Jarasangh Nagri at Jorve , Ahmednagar (ii) Stone Circle at Arsoda , Gadchiroli (iii) Group of twenty Cromlechs or Kistvaens at Chamorshi , Gadchiroli (iv) Stone Circle at Nildho (v) Stone Circle at Takalghat, Nagpur
Bangaluru	Karnataka	3	(i) Pre-Historic Site, Kittur, (ii) Pre-Historic Site Chikkajala and (iii) Pre-Historic Site Hejjala
Bhopal	Madhya Pradesh	2	(i) Rock Inscription (ii) Fresco Bachhaun Paintings, Gahira, Rewa
Chandigarh	Haryana	2	(i)Kos Minars at Shahbad and (ii) Kos Minar at Mujessar
Chennai	Tamil Nadu	3	(i) One Jaina statue, (ii) old town wall and (iii) David Yale & Joseph Hynmer's tomb
Dehradun	Uttarakhand	2	(i) Kheraki Bandi, Roorkee and (ii) Kutumbari temple, Dwaraahat, Almora
Delhi	Delhi	15	(i) The Moti Gate of Sher Shah's Delhi, Mauza Babarpur Bazidpur, (ii) Pool Chadar, Mauza Chaukri Mubarakabad, (iii) Alipur Cemetery, Alipur encamping ground, (iv) Bara Khamba Cemetery, Imperial city, (v) Tomb of Capt. Mc. Barnett & others who falls in an attack on Kishanganj, Kishanganj, (vi) Tomb with three domes near railway station, Nizamuddin, (vii) Site of Siege Battery bearing the inscription:- " Right Attack, Lieutenant F.R. Mansell, R.E.,

			Directing Engineer, No.1 Battery-Right, Major James Brind, R.A., Commanding, Armament five 18-pounders: one 18-inch howitzer. To silence Mori Bastion.", East of the hospital in police line, (viii) Site of Siege Battery with following inscription:- "No. II Battery-Right, Major Edward Kaye, R.A., Commanding Armament two 18-pounders; seven 8-inch howitzers, To breach Kashmir bastion.", Compound of Curzon House, (ix) Inchla Wali Gumti, village Mubarak pur Kotla, (x) Mound known as Joga Bai comprised in part of Survey plot no. 167 as Jamia Nagar, (xi) Shamsi Tallab together with both the platform entrance gates, Mehrauli, (xii) Nicholson Statue, its platform, its surrounding gardens, paths and enclosure wall, Outside of Kashmiri Gate, (xiii) Site siege battery at Quadsia Mosque garden, (xiv) Site siege battery at Quadsia Mosque garden, (xv) Sat Narain Bhawan
Dharwad	Karnataka	1	(i) Nandikesvara Inscription at Bijapur
Guwahati	Assam	6	(i) Ruins of Copper Temple (ii) Guns of Emperor Sher Shah (iii)Tomb of Lt. Cresswell, Goalpara (iv) Sculpture of Bhairavi, Kamkhya Hill (v) Sculptures in Chummery Compound, Tezpur (vi) Stone Memorial of U-Mawthoh-Dur, Shillong
Hyderabad	Andhra Pradesh	8	(i) Ancient Buddhist remains and Brahmi inscriptions on the mound, (ii) Sculptures, carvings, images or other like objects (iii) Hills of Nagarjunakonda with the ancient remains (iv) Sculptures, carvings, images on the ancient mound (v) Sculptures, carvings, images other like objects found in the vicinity of the mosque (vi) Large Dolmen (vii) Mounds-Dibba no. 1 to 5 (viii) Mound, Nagulavaram
Jaipur	Rajasthan	3	(i)Temple Baran, Inscription Nagar Tonk (ii) Archeological site (iii) Remains at Jeora, Nilodh
Kolkata	West Bengal	7	(i) A Mound and a statue of surya (ii) A Mound with a Jain statue (iii) Image of Durga slaying Mahishasura under a tree (iv) Temple site now represented only by a mound (v) A mound with an image of Nandi on it (vi) A mound with statues of Ganesh and Nandi on it (vii) Ruins of fort Nadia, West Bengal

Lucknow	Uttar Pradesh	9	(i) Remains of large temple, Ram Nagar, Chitrakoot (ii) Closed Cemetery, Katra Naka, Banda (iii) Large ruined site called Sandi Khera, Pali, Shahabad, Hardoi (iv) Cemetery, Jalaun (Bus Stand), Jalaun (v) Gunner Burkill's Tomb, Rangaon, Mehroni, Lalitpur (vi) Imambara Amin-ud-Daula, Lucknow, (vii) Three Tombs, Lucknow-Faizabad Road at miles 3, 4 & 5, Lucknow (viii) Cemeteries at miles 6 & 7, Jahraila Road, Lucknow (ix) Cemetery at Gaughat, Lucknow
Mumbai	Maharashtra	3	(i) Old European Tomb at Pune (ii) One burj at Agarkot (iii) Portuguese Monastery over the cave large watch Tower on the adjoining hill at Mandapeshwar, Borivali
Srinagar	J&K	3	(i) Rock carving of Sitala, Narada, Brahma and Radha Krishna (Basohli) (ii) Visvesvara cave temple and other cave temples (Basohli) (iii) Rock carving of Devi riding a lion
Vadodara	Gujarat	2	(i) Ancient Site, Sejakpur , Surendranagar (ii) Historic Site .No. 431 to 435, Vadodara
Patna	Bihar	11	(i) Ruins of three small linga temple circle 1000 AD, Ahugi Mirzapur, (ii) Three sites with megaliths on the western and north eastern toes of the hill, Chandauli, (iii) Tablet on treasury building, Varanasi, (iv) Telia Nala Buddhist ruins, Varanasi, (v) A Banyan grove containing traces of ancient building, Amavey, Ballia, (vi) Dih or mound of ruins called Suri-ka-Raj, Ghazipur, (vii) Mound of brick ruins, Sahiya Kushinagar, (viii) A series of enormous mound, Gorakhpur, (ix) Remains of ramparts and the mound commonly known as 'Queen's Palace' in the old fort known as Killa, Bihar sharif, Nalanda, (x) Large Dih or mound at Chetion, Kasia,Kushinagar (xi) Mound of ruins called Sareya, Kishinagar
		92	

Annex 2.2
(Refer Para 2.6.3)

Details of Cases where Final Notification was not Issued

Circle	Name of the monument
Hyderabad	Ancient Site at Pusalapadu, District Prakasam
Patna	Long mound, Distt,Chandausi, Uttar Pradesh
	Large rectangular shape mound, Distt Chandausi, Uttar Pradesh
	Small conical mound of ruins called Devi-ka-Sthan, Distt Chandausi, Uttar Pradesh
	Ancient Buddhist site known as Chaukhandi Stupa, Distt Chanduasi, Uttar Pradesh
Kolkata	St Johns' Church
Bhopal	Kamlapati Mahal and adjoining areas, Bhopal
	The statue of a boar (Vishnu Varah), an image of Mahadeo and figures of other Hindu and Jain Gods, scattered over four tumuli and under a bargat tree, Katni
	Shiva temple on a carved stone chabutra and 8 stone jain images, Katni
	Ladaki-ka-Tila, Katni
	Painted rock shelters, two Buddhist stupas and other other remains, Sehore, MP
	The site of Kankalidevi temple including the Devi temple and ruined temple close to them, Katni, MP
Guwahati	Ancient mound called Shyam Sunder Till
	Pujakhola, Tripura
Trissur	Tenkailasanatha Temple
	Shiva temple, Thiruvanchikulam

Annex 2.3
(Refer Para 2.6.8)

Antiquities Protected as Monuments

S No	Circle office	District	Name of the monument
1.	Guwahati	Sib sagar	Eight Cannons of the Ahom period on the bank of the Sibsagar tank, Sibsagar
		Sib sagar	Siva idol, Joysagar
		Tin Sukhia	Gun of the Emperor Sher Shah, Sadia
		Tin Sukhia	Two Swivel guns belonging to the Mughal Nawwara, Sadia
2.	Patna	Patna	Tank
3.	Raipur	Bastar	Ganesh statue
4.	Vadodara	Diu	Bangli
5.	Dharwad	Bijapur	All old guns on ramparts and in trophy
6.	Mumbai	Sholapur	Mahadev Stones
		Thane	Carved Stones
7.	Jaipur	Bharatpur	Looted gun
		Bharatpur	Marble Jholla
		Bharatpur	Kaccha Bag
8.	Chennai	Thanjavur	Big Cannon (Rajagopaol Cannon) in the first Rampart and the Bastions in Ts No. 608 of Ward iii
		Vellore	The Cannon
9.	Lucknow	Mahoba	Five life sized elephant statues
		Jaunpur	Stone group of a gigantic lion standing on a small elephant. It is lying on Akbar's bridge
10.	Kolkata	Bankura	Dalmadal Gun and the platform on which it is mounted
		Murshidabad	Jahan Kosa Gun

Annex 2.4
(Refer Para 2.8.2)

Unauthorised Closure of Monument or its Parts

Sl. no.	Name of the Circle	Name of the monument
1.	**Bhopal**	Man Mandir Palace, Gwalior
2.		Cave no. 20 at Udaigiri
3.		Bhimbetka, WHS
4.		Some part of Hammam, Burhanpur
5.	**Delhi**	Safdarjung tomb
6.		Najaf Khan Tomb
7.		Jantar Mantar
8.		Qutb Minar
9.		Lal Qila
10.		Munda Gumbad
11.		Sakri Gumti
12.		Lal Gumbad
13.		Kale Khan Tomb
14.		Lal Gumbad, Chirag Delhi
15.		Sunder Burj
16.	**Dharwad**	Bidar Fort
17.		Vittala Complex, Hampi
18.	**Goa**	Convent of St. Francis of Assisi
19.	**Hyderabad**	Buddhist remains at Manchikallu
20.		One portion of Charminar
21.	**Lucknow**	Flat roofed temple, Mahoba and Lakhanpur Mound at Hamirpur
22.	**Raipur**	Sabhamantapa of Vittala complex
23.	**Shimla**	Ruined Fort, Kangra

Annex 3.1
(Refer Para 3.1)
List of World Heritage Sites

Sl. no.	Name of the Site	Year of inclusion	State
I Cultural Sites (Under protection of ASI)			
1.	Ajanta Caves	1983	Maharashtra
2.	Ellora Caves	1983	Maharashtra
3.	Agra Fort	1983	Uttar Pradesh
4.	Taj Mahal	1983	Uttar Pradesh
5.	Sun Temple, Konark	1984	Orissa
6.	Group of monuments at Mahabalipuram	1984	Tamil Nadu
7.	Churches and Convents of Goa	1986	Goa
8.	Group of temples, Khajuraho	1986	Madhya Pradesh
9.	Group of monuments at Hampi	1986	Karnataka
10.	Group of monuments, Fatehpur Sikri	1986	Uttar Pradesh
11.	Group of temples, Pattadakal	1987	Karnataka
12.	Elephanta Caves	1987	Maharashtra
13.	Great Living Chola temples at Thanjavur Gangaikondacholapuram and Darasuram	1987 & 2004	Tamil Nadu
14.	Buddhist monuments at Sanchi	1989	Madhya Pradesh
15.	Humayun Tomb, Delhi	1993	Delhi
16.	Qutb Minar Complex, Delhi	1993	Delhi
17.	Prehistoric Rock Shelters of Bhimbetka	2003	Madhya Pradesh
18.	Champaner Pavagarh Archaeological Park	2004	Gujarat
19.	Red Fort Complex, Delhi	2007	Delhi
II Under Protection of Ministry of Railways			
20.	Mountain Railway of India (Darjeeling , Nilgiri , Kalka Shimla)	1999, 2005, 2008	West Bengal, Tamil Nadu, Himachal Pradesh
21.	Chhatrapati Shivaji Terminus (formerly Victoria Terminus)	2004	Maharashtra
III (Under protection of Bodhgaya Temple Management Committee)			
22.	Mahabodhi Temple Bodhgaya	2002	Bihar
IV (Under protection of Rajasthan State Archaeology and Museums Department)			
23.	Jantar Mantar Jaipur	2010	Rajasthan

Sl. no.	Name of the Site	Year of inclusion	State
V Natural Sites (Under protection of Ministry of Environment and Forest)			
24.	Kaziranga National Park	1985	Assam
25.	Manas Wild life sanctuary	1985	Assam
26.	Keoladeo National Park	1987	Rajasthan
27.	Sunderban National Park	1987	West Bengal
28.	Nanda Devi and Valley of Flowers National Parks	1988, 2005	Uttarakhand
29.	Western Ghats	2012	Kerala, Tamil Nadu, Andhra Pradesh

Annex 3.2
(Refer Para 3.2.2)

Monuments in the Tentative List for World Heritage Sites

Sl. no.	Name of the Monument/Site	Month and Year of inclusion in the Tentative list
1.[67]	Ancient Buddhist Site, Sarnath, Varanasi, Uttar Pradesh	July 1998
2.	Bhitarkanika Conservation Area	May 2009
3.	Buddhist Monastery Complex, Alchi, Leh, known as Alchi Chos-kor	July 1998
4.	Churchgate - Extension to Mumbai CST	January 2009
5.	Delhi - A Heritage City	May 2012
6.	Desert National Park	May 2009
7.	Dholavira: a Harappan City, Gujarat, Disstt, Kachchh	July 1998
8.	Excavated Remains at Nalanda	January 2009
9.	Golconda Fort, Hyderbad, Andhra Pradesh	July 1998
10.	Great Himalayan National Park	May 2009
11.	Group of Monuments at Mandu, Madhya Pradesh	July 1998
12.	Hemis Gompa	July 1998
13.	Hill Forts of Rajasthan	December 2010
14.	Historic city of Ahmadabad	March 2011
15.	Kangchendzonga National Park	March 2006
16.	Mattanchery Palace, Ernakulam, Kerala	July 1998
17.	Mughal Gardens in Kashmir	December 2010
18.	Namdapha National Park	March 2006
19.	Neora Valley National Park	May 2009
20.	Oak Grove School	January 2009
21.	Rani-ki-Vav (The Queen's Stepwell) at Patan, Gujarat	July 1998

[67] Brown Colour entries depict ASI protected Monuments/Sites

Sl. no.	Name of the Monument/Site	Month and Year of inclusion in the Tentative list
22.	River Island of Majuli in midstream of Brahmaputra River in Assam	March 2004
23.	Santiniketan	January 2010
24.	Silk Road Sites in India	January 2010
25.	Sri Harimandir Sahib, Amritsar, Punjab	January 2004
26.	Temples at Bishnupur, West Bengal	July 1998
27.	The Kangra Valley Railway - Extension to the Mountain Railways of India	January 2009
28.	The Maharaja Railways of India	January 2009
29.	The Matheran Light Railway (extension to the Mountain Railways of India)	November 2005
30.	The Qutb Shahi Monuments of Hyderabad Golconda Fort, Qutb Shahi Tombs, Charminar	September 2010
31.	The Victorian & Art Deco Ensemble of Mumbai	May 2012
32.	Tomb of Sher Shah Suri, Sasaram, Bihar	July 1998
33.	Urban and Architectural Work of Le Corbusier in Chandigarh	October 2006
34.	Wild Ass Sanctuary, Little Rann of Kutch	March 2006

Annex 3.3
(Refer Para 3.4)

General Information of World Heritage Sites for the period 2007-08 to 2011-12

Name of the site	Expenditure on conservation (₹ in crores)	Indian Visitors (number in lakh)	Foreign Visitors (number in lakh)	Revenue (₹ in crore)	Number of Security Guards	Number of Encroachment cases	Number of cases of Unauthorised construction
Sun temple, Odisha	2.82	93.07	0.44	9.91	52	Nil	Nil
Khajuraho, Madhya Pradesh	3.19	11.26	4.35	9.43	9	Nil	628
Bhimbetka, Madhya Pradesh	0.29	Non ticketed Monument			20	1	Nil
Buddhist Monument Sanchi, Madhya Pradesh	0.73	8.49	0.47	1.85	2	Nil	49
Taj Mahal, Uttar Pradesh	72.71	172.94	30.55	84.9	275	Nil	33
Fatehpur Sikri, Uttar Pradesh	53.94	16.29	10.18	24.87	46	Nil	194
Agra Fort, Uttar Pradesh	46.3	70.55	17.52	47.94	45	Nil	7
Hampi, Karnataka	14.87	22.35	1.65	6.26	79	2	41
Ajanta Caves, Maharashtra	7.19	15.4	1.17	4.97	42	Nil	Nil
Ellora Caves, Maharashtra	4.67	37.78	1.02	7.15	42	Nil	Nil
Elephanta Caves, Maharashtra	0.59	12.98	0.93	4.05	29	Nil	Nil
Mahabalipuram, Tamil Nadu	2.5	47.27	3.42	12.94	14	Nil	39
Chola temples, Thanjavur	3.19	Non ticketed Monument			18	Nil	64
Champaner, Pavagadh, Gujarat	3.48	4.62	0.08	0.48	66	1	107
Pattadakal, Karnataka	0.78	13.22	0.28	1.83	22	Nil	Nil
Churches of Goa	3.71	Non ticketed Monument			7	Nil	Nil
Red Fort, Delhi	14.51	117.16	7.45	25.59	436	2	13
Qutb Minar, Delhi	5.72	121.21	14.24	47.73	57	1	Nil
Humayun's Tomb, Delhi	2.77	17.51	11.23	30.13	67	Nil	Nil

Annex 3.4
(Refer Para 3.4 and 3.5)

Details of Deficiencies at the World Heritage Sites

Irregularity/Non Availability of	Number of Monuments/ Sites	Name of the Monument/Site
Site Plan and notification with Sub Circle	5	Qutb Minar, Humayun's Tomb, Hampi, Great Living Chola temples Thanjavur and Mahabalipuram
Long Term Plan	14	Hampi, Sanchi, Bhimbetka, Khajuraho, Mahabalipuram, Chola Temples, Elephanta Caves, Ellora, Qutb Minar, Red fort, Humayun's Tomb, Agra Fort, Fatehpur Sikri and Taj Mahal
Drinking Water	1	Churches of Goa
Lockers	11	Ajanta, Ellora, Elephanta, Fatehpur Sikri, Mahabalipuram, Bhimbetka and Pattadakal, Churches of Goa, Hampi, Konark Sun Temple, Champaner
Facility for differently abled	6	Red Fort, Humayun's Tomb, Chola Temples Thanjavur, Mahabalipuram, Bhimbetka and Hampi
Publication	4	Hampi, Churches of Goa, Chola Temple and Pattadakal
Inspection and Maintenance	6	Agra Fort, Pattadakal, Churches of Goa, Red Fort, Qutb Minar and Humayun's Tomb
Security Equipment (Hand Held Metal detectors, scanners)	7	Pattadakal, Champaner and Churches of Goa, Bhimbetka, Chola Temples Thanjavur, Mahabalipuram, Elephanta
CCTV	16	Konark Sun Temple, Hampi, Pattadakal, Churches of Goa, Champaner, Bhimbetka, Chola Temples, Mahabalipuram, Elephanta, Ellora and Ajanta, Red Fort, Qutb Minar, Humayun's Tomb, Fatehpur Sikri and Agra Fort.
Lightening Detectors	8	Humayun's Tomb, Agra Fort, Ajanta, Elephanta, Mahabalipuram, Bhimbetka, Sanchi and Hampi
Guide Service	19	Red Fort, Humayun's Tomb, Qutb Minar, Ajanta, Ellora, Elephanta, Chola Temples Thanjavur, Mahabalipuram, Khajuraho, Bhimbetka, Sanchi, Churches of Goa, Hampi, Pattadakal, Sun Temple, Champaner, Taj Mahal, Agra Fort, Fatehpur Sikri

Audio Guide Service	14	Red Fort, Humayun's Tomb, Fatehpur Sikri, Bhimbetka, Hampi, Pattadakal, Ajanta, Ellora, Elephanta, Mahabalipuram, Chola temples Thanjavur, Churches of Goa, Sun temple, Champaner
Encroachments	5	Hampi, Champaner, Bhimbetka, Red Fort, Qutb Minar,
Unauthorised Constructions	10	Khajuraho, Sanchi, Fatehpur, Taj Mahal, Agra Fort, Hampi, Chola Temples Thanjavur, Mahabalipuram, Champaner and Red Fort
Monument Partly closed	9	Agra Fort, Red Fort, Qutb Minar, Taj Mahal, Ajanta, Bhimbetka, Churches of Goa, Hampi and Sun Temple.

Annex 4.1

(Refer Para no. 4.7)

Details of ASI and NCF Projects

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
1.	Humayun's Tomb, New Delhi	16.4.1999	Conservation, research documentation, reinstating of water systems and illumination apart from restoration of gardens	Aga Khan Trust, Geneva and M/s. Oberoi Group of Hotels, New Delhi.	30.46	30.46	0.16	Completed
2.	Shaniwarwada Palace, Pune	22.1.2001	To enliven the environs and recreate the splendor of Shaniwarwada Palace, Pune.	Pune Municipal Corporation	96.03	96.03	27.94	Completed
3.	Jantar Mantar, New Delhi	11.10.2000	Conservation and enhancement of Jantar Mantar, New Delhi.	M/s. Apeejay Surendra Hotels Ltd.	10.00	16.50	6.37	Even after 12 years the project could not be completed. The Project Implementation

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
								Committee (PIC) was not aware of items like selection of project consultant firms for carrying out the lighting and signage etc as these were managed only by the donor. The MoU though valid for 5 years had not been revised.
4.	Taj Mahal, Agra	21.6.2001	Preservation, upgradation Taj Mahal, Agra.	M/s. Indian Hotels Company Ltd., ASI	187.00	104.00	0.03	The validity of MoU was 25 years. The donor intimated that they had spent entire committed amount and were not in a position to commit/contribute any further funds and intend to close the project. DG ASI was asked to report on current status in December 2010 which was still pending. (February 2013)

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
5.	Development of: 1. Qutb Minar, Delhi 2. Sun Temple, Konark, Orissa 3. Kanheri, Maharashtra 4. Hampi, Karnataka 5. Khajuraho, MP	30.3.2001	Development and conservation	Indian Oil Corporation (IOC)	4000.00	2700.00	110.83	An amount ₹ 26.00 crore, received from IOC was transferred to Indian Oil Federation (IOF) against which tax exemption certificate was issued to IOC. No site work had started as yet. Monument had also been changed both by ASI and IOF. NCF was not interested in renewing the MoU with IOC.
6.	Jaisalmer Fort, Rajasthan	13.8.2003	Conservation, restoration of Jaisalmer Fort.	World Monuments Fund (1.96 crore), ASI (4.00 crore)	596.00	600.00	515.27	The MoU though signed with an international organisation was however not vetted by any legal expert, had not any timelines etc. Though a joint account was opened, payments were made without signatures of representatives of WMF.

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
								Some studies like soil testing, geological studies etc. were carried out but field work had not started even after nine years of signing of MoU.
7.	Lodhi Tomb, New Delhi	10.1.2006	Lodhi Garden Monuments (i) Sikandar Lodi Tomb (ii) Sheesh Gumbad (iii) BadaGumbad, Mosque (iv) Mohammad Shah Tomb an (v) Athpula (Old Lodi Bridge)	M/s. SAIL, New Delhi.	100.00 + 50.00 (for maintenance for five years after completion of conservation)	50.00	27.33	Being overburdened, ASI refused to take up the work and it was awarded to INTACH. No formal work order/agreement was signed with INTACH. The work carried out by INTACH, when reviewed by ASI was found to be of poor quality. INTACH agreed to carry out the corrections and asked to release the second instalment. However, ASI asked to carry out the corrections before release of any more funds. No further progress was noticed.

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
8.	Lauriya Nandan Garh Project	18.12.2007	Development of tourist amenities at Lauriya Nandan Garh, Chanki Garh and Rampurwa, West Champaran Bihar.	M/s. Bokaro Steel Plan	50.00	25.00	25.04	No field work had started as yet even after five years of signing of MoU. The validity of MoU was till Dec 2012.No efforts had been made to revise the MoU. NCF informed that ASI had suggested changing the monument due to inaccessibility and working conditions.
9.	Gol Gumbaz, Bijapur	22.2.2008	Restoration of Gol Gumbaz, Bijapur	M/s. State Trading Corp Ltd.	50.00	10.00	11.40	The consultant was to be selected for the project. No field work had started as yet.
10.	Wazirpur-Ka-Gumbad, New Delhi	28.3.2008	Restoration of Wazirpur-Ka-Gumbad , Munirka, New Delhi	M/s. PEC Ltd.	25.00	16.00	1.48	MoU was signed but after more than three years, ASI asked the project sponsor to change the monument. NCF never objected and took up 'Yusuf Qattal' by issuing an addendum in Aug 2011. Work was still

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
								under progress. MoU which was valid only for three years had not been revised.
11.	Krishna Temple, Hampi	12.6.2008	Conservation of Krishna Temple, Hampi	Hampi Foundation, Karnataka	400.00	40.00	34.68	No concrete work hadstarted; the scope of work of consultant was yet to be defined.
12.	Hidimba Devi Project	15.7.2008	Restoration of Hidimba Devi Temple, Manali.	UCO Bank, Chandigarh	20.00	20.00	22.27	The actual work at site had not yet started. The addendum to the MoU was to be issued.
13.	Tughlaqabad Fort Project	13.4.2009	Adoption of Tughlaqabad Fort, New Delhi.	M/s. GAIL India Ltd.	30.00	30.00	32.95	After two years of signing of MoU, ASI changed the monument citing security problems. NCF neither raised any objection nor issued an addendum to this effect.
14.	Ibrahim Rauza Project	11.12..2009	Development of Gardens of Ibrahim Rauza and GolGumbaz, Bijapur	Naurus Trust, Karnataka	30.00	15.00	15.40	The work was to be carried out in three phases in four years. So far only the first phase had been completed.

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
15.	Mandu, Vikramshila and Lalitgiri/Dhauli	22.12.2009	Conservation	M/s. NTPC Ltd.	500.00	50.00	55.67	Two years after signing of MoU, ASI requested NTPC to shift the monument from Jageshwari to Vikramshila. The work was under progress
16.	Shiv Temple, Ambernath	25.2.2010	Conservation of ancient Shiv Temple, Ambernath.	M/s. Nagarik Seva Mandal, Ambernath	22.31	22.31	22.31	The actual work at the site had not yet started.
17.	Ahom Monument	29.6.2010	Renovation and maintenance of four Ahom monuments:-	ONGC	238.00	30.00	15.59	PIC meeting in Aug 2011 decided that: The project should be implemented by Regional Director, East and his team. SA, Guwahati Circle would call for EOI for employing the required personnel on contract basis for implementation of the project.

S No.	Name of the Project	Date of Signing of MoU	Purpose of MoU	Project Sponsor	Total Committed Amount (₹ in lakhs)	Contribution by Sponsor till 31.3.12 (₹ In lakh)	Balance in Project Account as on 31.3.12 (₹ In lakh)	Project Status
18.	Hazarduari Palace	13.7.2010	Adoption of Hazarduari Palace, West Bengal.	State Bank of India, Kolkata Branch	75.00	20.00	21.03	The actual work at the site had not yet started.
19.	Shore Temple, Mahabalipuram	19.4.2011	Construction of toilets at Shore Temple, Mahabalipuram	Shipping Corporation of India	40.00	6.00	0.25	NCF stated that the work was going to be completed very soon.

Annex 4.2

(Refer case study no. 5)

Conditions of Kos Minars Noticed During Joint Physical Inspection

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
1.	Kos Minar, CheemaKalan (Distt. Jalandhar)	Nakodar/ Chandigarh	No	No	Yes	No	Yes	No	No	No	Nil	**Yes**
2.	Kos Minar, BirPind (Distt. Jalandhar)	Nakodar/ Chandigarh	No	No	Yes	No	No	No	No	No	Nil	**Yes**
3.	Kos Minar, Nakodar (Distt. Jalandhar)	Nakodar/ Chandigarh	No	No	Yes	Yes	Yes	Yes	Yes	No	Nil	**Yes**
4.	Kos Minar, DakhniJahangir (Distt. Jalandhar)	Nakodar/ Chandigarh	No	No	Yes	No	No	No	No	No	Nil	**Yes**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
5.	Kos Minar, Dakhni Dhada Khanpur (Distt. Jalandhar)	Nakodar/ Chandigarh	No	No	Yes	No	No	No	No	No	Nil	**Yes**
6.	Kos Minar Kohand (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	Yes	No	Yes	No	Nil	**No**
7.	Kos Minar Gharaunda south (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	Yes	Yes	Yes	No	Nil	**No**
8.	Kos Minar Gharaunda north (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	No	No	Yes	No	Nil	**Yes**
9.	Kos Minar Kutail (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	No	Yes	Yes	No	Nil	**Yes**
10.	Kos Minar Tirawari north (Distt. Karnal)	Thanesar/ Chandigarh	No	No	Yes	No	Yes	No	No	No	Nil	**Yes**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
11.	Kos Minar Bheni Kalan (Distt. Karnal)	Thanesar/ Chandigarh	No	No	Yes	No	No	No	No	Yes	3,36,507	**No**
12.	Kos Minar Daha (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	Yes	No	Yes	No	Nil	**Yes**
13.	Kos Minar Namastay Chowk, Karnal	Thanesar/ Chandigarh	No	No	Yes	No	No	No	No	Yes	2,37,008	**No**
14.	Kos MinarKarnal city	Thanesar/ Chandigarh	No	No	Yes	No	Yes	No	Yes	Yes	2,12,990	**No**
15.	Kos Minar Tirawari south (Distt. Karnal)	Thanesar/ Chandigarh	No	No	No	No	Yes	No	Yes	No	Nil	**Yes**
16.	Kos Minar No.11, Mawai (Faridabad)	Narnaul/ Chandigarh	No	No	No	No	Yes	No	Yes	Yes	30,736	**No**
17.	Kos Minar Khiwaza Sarai (Faridabad)	Narnaul/ Chandigarh	No	No	Yes	No	Yes	No	Yes	Yes	81,212	**No**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
18.	Kos Minar No. 18, Alapur (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	Yes	Yes	Yes	Yes	97,513	**No**
19.	Kos Minar No. 15, Sikri (Distt. Palwal)	Narnaul/ Chandigarh	No	No	No	No	Yes	No	Yes	Yes	3,63,925	**No**
20.	Kos Minar No. 17, Gudhpuri (Distt. Palwal)	Narnaul/ Chandigarh	No	No	No	No	No	No	Yes	Yes	4,02,308	**No**
21.	Kos Minar No. 19 (Distt Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	Yes	Yes	Yes	Yes	3,23,106	**No**
22.	Kos Minar No. 20, Khusropur (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	Yes	No	Yes	Yes	3,62,265	**No**
23.	Kos Minar No. 21, Khera Sarai (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	No	No	No	Yes	3,35,517	**No**
24.	Kos Minar No. 22, Aurangabad	Narnaul/ Chandigarh	No	No	Yes	No	Yes	No	Yes	No	Nil	**No**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
	(Distt. Palwal)											
25.	Kos Minar No. 25, Banchari (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	No	No	Yes	Yes	3,95,272	**No**
26.	Kos Minar No. 24, Banchari (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	No	No	Yes	No	No	Nil	**No**
27.	Kos Minar No. 23, Khatela (Distt. Palwal)	Narnaul/ Chandigarh	No	No	No	No	Yes	No	Yes	No	Nil	**No**
28.	Kos Minar No. 16, Gudhpuri (Distt. Palwal)	Narnaul/ Chandigarh	No	No	No	No	No	No	Yes	Yes	4,41,454	**No**
29.	Kos Minar No. 27 Bhulwana (Distt. Palwal)	Narnaul/ Chandigarh	No	No	Yes	Yes	Yes	No	No	No	Nil	**No**
30.	Kos Minar No. 26, Hodal (Distt. Palwal)	Narnaul/ Chandigarh	No	No	No	No	No	Yes	Yes	No	Nil	**No**
31.	Kos Minar, Mile 3, Furlong	Mathura Delhi road	No	No	Yes	Yes	No	No	No	No	Nil	**Yes**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
	5.175 from the boundary, Mathura-Delhi Road, Mathura											
32.	Kos Minar or Mughal milestone, Delhi	Delhi Zoo	No	No	No	No	Yes	No	Yes	NO	Nil	**Yes**
33.	Kos Minar erected by Emperor Akbar	Ajmer Jaipur Road	No	No	No	No	Yes	Yes	No	No	nil	**Yes**
34.	Kos Minar erected by Emperor Akbar	Ajmer Jaipur Road	No	No	Yes	Yes	Yes	No	No	Yes	41786	**Yes**
35.	Kos Minar erected by Emperor Akbar	Chugra, Ajmer	No	No	No	No	No	No	Yes	No	nil	**Yes**
36.	Kos Minar erected by Emperor Akbar	Kair, Ajmer	No	No	No	No	No	No	No	Yes	17567	**Yes**
37.	Kos Minar	Chhatri,	No	No	No	No	No	No	No	Yes	Nil	**Yes**

S No	Name of Kos Minar	Location (Sub-Circle/ Circle)	Copy of notification available at sub circle	Site plan available at sub circle	Protection Notice Board	Cultural Notice Board	Access Road	Encroach-ment	Construction in prohibited/ regulated area	Annual Repair/ Special Repair during 2007-08 to 2011-12	Expenditure Incurred on Annual Repair/ Special Repair during 2007-08 to 2011-12 (₹)	Need chemical treatment
	erected by Emperor Akbar	Ajmer										
38.	Kos Minar erected by Emperor Akbar	Khanpur, Ajmer	No	No	No	No	Yes	No	Yes	Yes	Nil	**Yes**
39.	Kos Minar erected by Emperor Akbar	Hoshiara, Ajmer	No	No	No	No	Yes	No	No	Yes	Nil	**Yes**
40.	Kos Minar erected by Emperor Akbar	Hoshiara, Ajmer	No	No	No	No	Yes	No	No	Yes	Nil	**Yes**

Annex 5.1
(Refer Para 5.4.1)
List of Excavation Proposals for which no Reasons were Assigned for not Recommending them

S.No.	Name of the site	Office	Director	Nature of work
1.	Bhimbetka Rock Paintings, District Raisen, Madhya Pradesh	Prehistory Br. Nagpur	D. Bhengra	Exploration
2.	Melghat Region, Distt. Amaravati, Maharashtra	Prehistory Br. Nagpur	D. Bhengra	Exploration
3.	Vaisya Tekri, Distt. Ujjain, M.P.	Bhopal Circle	K.K. Muhammed	Excavation
4.	Exploration in District Bhiwani, Haryana	Chandigarh Circle	K.P.S. Bhadoria	Exploration
5.	Exploration of the Mewat area in Ferozepur Jhirka Tehsil Distt. Gurgaon	Chandigarh Circle	K.P.S. Bhadoria	Exploration
6.	Excavation of Stupa at Asandh, Distt. Karnal, Haryana(1/10/2/2007-EE)	Chandigarh Circle	K.P.S. Bhadoria	Excavation
7.	Preliminary joint exploration and trial trenches at Gopakapattanam, North Goa	Goa Circle	N. Taher	Exploration/ excavation
8.	Excavation at Kayavarohan, Distt. Vadodara,Gujarat	Vadodara Circle	Shivananda V.	Excavation
9.	Excavation in front of Khan Masjid, Dholka ,Ahmedabad	Vadodara Circle	Shivananda V.	Excavation
10.	Bidyadharpur, Tahsil Cuttack Sadar, Distt. Cuttack, Orissa	Orissa State Museum, Bhubaneswar, Orissa	C.B. Patel	Excavation
11.	Narasinghpur and its adjoining area, Distt. Cuttack, Orissa	Orissa State Museum, Bhubaneswar, Orissa	C.B. Patel	Excavation
12.	Panchagaon, Old Town, Bhubaneswar, Distt. Khurda, Orissa	Orissa State Museum, Bhubaneswar, Orissa	C.B. Patel	Excavation
13.	Doilopar at Dhaka – Bichkandi, Mouza Bichkandi, J.L. No.125, G.P. Sabalpur, Block Gramsalika P.S. Burwan in Murshidabad, West Bengal	Director, Directorate of Archaeology & Museums, West Bengal	Amal Roy	Excavation
14.	Kharihat, Belan Valley, Mirzapur District, Murzapur, U.P.	Allahabad Uni.	Prakash Sinha	Excavation
15.	Chaturbhujnath Nala in Gandhisagar Game Sanctuary Bhanpura, Mandsaur, Madhya Pradesh	Rock Art Society of India, Agra	Giriraj Kumar	Excavation
16.	Sabarmati River Valley, Distt.	Excavation	S.N. Kesarwani	Exploration

S.No.	Name of the site	Office	Director	Nature of work
	Anand, Kheda, Ahmedabad, Gandhinagar, Mahesana & Sabar Kantha in Gujarat	Branch-V., Vadodara		
17.	Excavation of the area in front of Bibi-ka-Maqbara, Aurangabad	-do-	K. Veerabhadra Rao	Excavation
18.	Bhita District Allahabad, U.P.	Lucknow Circle, Lucknow	I.D. Dwivedi	Excavation
19.	Erich District Jhansi, U.P.	-do-	I.D. Dwivedi	Excavation
20.	Exploration in the trans Ghaghra plains with trial trenching and section scrapping in U.P.	-do-	I.D. Dwivedi	Exploration/excavation
21.	Ruam,Distt. East Singhbhum, Jharkhand	-do-	T.J. Baidya	Excavation
22.	Kabrakala, Distt. Palamu, Jharkhand	-do-	T.J. Baidya	Excavation
23.	Kunnattur, District Tirunelveli, Tamil Nadu	Thrissur Circle	M. Nambirajan	Excavation
24.	Phanigiri (V)Tirumalagiri (M) Nalgonda District	Deptt. of Archaeology & Museums, Hyderabad	G.V. Ramakrishna Rao	Excavation
25.	Jagathipadu (V), Polaki (M) Srikakulam District	-do-	G.V. Ramakrishna Rao	Excavation
26.	Manikeswaram (V), Addaki (M), Prakasham District	-do-	G.V. Ramakrishna Rao	Excavation
27.	Village Udaipur,Vidhuna District – Auraya	Deptt. of Archaeology, U.P.	R.K. Srivastava	Excavation
28.	Exploration of Mau District Banda, U.P.	-do-	Ram Naresh Pal	Exploration
29.	Balam Baghada, District Allahabad, U.P.	-do-	J.N. Pandey	Excavation
30.	Hetapatti, District Allahabad, U.P.	-do-	J.N. Pal	Excavation
31.	Exploration of adjacent area of Turki Bruz Villalge Kori, Pojha and Murgiya District Vaishali, Bihar	Bihar Puravid Parishad, Patna	C.P. Sinha	Exploration
32.	Exploration and excavation of all the nine Buddhist sites (Neuli-Deulipal, Kayama, Tarapur, Kantigadia, Vajragiri, Neulpur & Kanki (Radhanagar Fort)	Orissan Institute of Maritime and South-East-Asian Studies, Bhubaneswar, Orissa	D.R. Pradhan	Exploration and Excavation

Annex 5.2

(Refer Para 5.8.1)

List of Pending Excavation Reports
Large scale Excavations by serving officers

Sl. No.	Site, Period/s of excavation	Director of Excavation	Reporting Archeologist	Month/Year in which work was originally assigned	Work Re Assigned On
1.	Chichali, District West Nimar 1998-99, 1999-2000	S.K. Mitra, SA	S.K.Mitra, SA, Excavation Branch-I, Nagpur	April 2005	August 2010
2.	Hampi, District Bellary, Karnataka, 1975-76,76-77,1978-79 to 2000-01	S. R. Rao	KP Poonacha, Joint Director General (Retd)	April 2005	December 2009
3.	Mathura, District Mathura, Uttar Pradesh 1954-55, 73-74 to 1976-77	M Venkataramayya	A.K. Sinha, Director(NCF)	March 2006	August 2010
4.	Sravasti, District Bahraich, Uttar Pradesh 1958-59,1986-97,1998-99,2000-01,2001-02	KK Sinha	Neeraj Kumar Sinha, AA, Ranchi Circle	April 2005	

Small scale Excavations by serving officers

Sl. No.	Site, Date of completion of excavation & Period of excavation	Director of Excavation	Reporting Archeologist	Work Assigned Date	Assigned Date
1.	Barabati Fort, District Cuttack, Orissa 1989-90 to 96-97	B.K Sinha	K.V.Rao, SA, Hyderabad Circle	June 2005	December 2010
2	Daulatabad, District Aurangabad, Maharashtra 1984-85, 85-86,87-88,88-89,2004-05,05-06	CL Suri	S.K. Mitra, SA, Excavation Branch-I, Nagpur	June 2005	March 2011
3	Fatehpur Sikri, District Agra, Uttar Pradesh 1976-77 to 79-80,82-83 to 88-89	JP Srivastava	KP Poonacha, Joint Director General(Retd.) (Reassigned to Shri JP Srivastava, Superintending Archeologist (Retd.))	June 2005	April 2010
4	Kashipur, District Udhamsingh Nagar, Uttranchal 1965-66,1970-71,2001-03	YD Sharma	DV Sharma, Regional Director, Kolkata	June 2005	February 2010
5	Kesaria,District East Champaran, Bihar 1997-98 to 2000-01	KK Mohammad	KK Mohammad, SA, Delhi Circle	October 2005	February 2010
6	Kolhua, District Muzaffarpur, Bihar 1976-77, 89-90 to 93-94,95-96 to 98-99	Vijaykant Mishra	KK Mohammad, SA, Delhi Circle (Reassigned to Arvind Manjul, DY SA, Patna Excavation Branch)	October 2005	May 2011
7	Kunnattur, District Kanchipuram, Tamil Nadu 1956-57,57-58	VD Krishnaswamy	Satyabhama Badhreenath, SA, Chennai Circle.		Action initiated in 2010 for fresh excavation by Excavation Branch-VI, Mysore
8	Madarpur, District Moradabad, Uttar Pradesh 2000-01	DV Sharma	DV Sharma, Regional Director, Kolkata		January 2010
9	Nalanda District Biharsharif, Bihar,	Vijaykant Mishra	KK Mohammad, SA, Delhi Circle	October 2005	Action initiated in

Sl. No.	Site, Date of completion of excavation & Period of excavation	Director of Excavation	Reporting Archeologist	Work Assigned Date	Assigned Date
	1975-76 to 1979-80, 1981-83				2010 for fresh excavation by Excavation
10	Paithan, District Aurangabad,Maharashtra 1997-98,98-99	JVP Rao	JVP Rao (Now expired, hence report to be submitted by Dr. Derek Kenet)	January 2005	Jan 2007 Reassigned date March 2010
11	Rajgir, District Biharshariff, Bihar 1953-54,54-55,57-58,58-59,61-62,62-63,74-75,99-00,00-01	DR Patil	KK Mohammad, SA, Delhi Circle	Oct 2005	March 2010
12	Rajpat Khalsa, District Cooch Behar, West Bengal 1998-99 to 1999-2000	SB Ota	SB Ota, Regional Director,Bhopal	June 2006	December 2009
13	Sankissa, District Farukhabad, UttarPradesh 1995-96,96-97	B R Mani	B R Mani, Jt. Director General	January 2005	March 2010
14	Semathan, District Anantnag, Jammu & Kashmir 1977-78,78-79,80-81	HK Narain	GS Gaur, ASA, Jammu Circle	April 2005	December 2009
15	**Siswania, District Basti,Uttar Pradesh 1995-96,96-97**	**BR Mani**	**BR Mani, Jt Director General**	**January 2005**	

Large scale Excavations by retired officers

Sl. No.	Site, Period/s of excavation	Director of Excavation	Director of Excavation/Reporting Archeologist	Assigned/Reassigned date
1	Ramapuram, District Kurnool, Andhra Pradesh 1980-81 to 1983-84	B Narasimhaiah	Late Dr. B Naraasimhaiah (Reassigned to Dr. K Ismail)	Reassigned date Jan 2011
2	Dholavira District Kuchchh, Gujarat	RS Bisht	RS Bisht(retired)	Reassigned date December 2009

Sl. No.	Site, Period/s of excavation	Director of Excavation	Director of Excavation/Reporting Archeologist	Assigned/Reassigned date
3	Banawali, District Fatehabad, Haryana 1983-84 to 86-87	RS Bisht	RS Bisht(retired)	August 2011
4	Harsh-ka-Tila, Thanesar, District Kurukshetra, Haryana 1987-88, 89-90	BM Pande	BM Pande (retired)	January 2010
5	Burzahom, District Srinagar, Jammu & Kashmir 1960-61 t6o 68-69, 71-72,73-74	T N Khazanchi	The work has been reassigned to Dr. RS Fonia, Director, National Mission on Monuments and Antiquities	June 2009
6	Banahalli, District Kolar, Karnataka 1973-74,83-84,85-86,86-87	S V Soundararajan	Late Dr. B Naraasimhaiah (Reassigned to Mr PS Sriraman, ASA, Fort Museum, Chennai Circle)	May 2010
7	Sanghol District Ludhiana, Punjab 1986-87 to 1990-91	C Margabandhu	C Margabhandhu(retired)	September 2010
8	Ayodhya, District Faizabad & Bhardwaj Ashram, District Allahabad, U.P	B B Lal	B.B Lal(retired)	The Report Writing Work is in progress.
9	Hulas, District Saharanpur, Uttar Pradesh 1978-79 to 1982-83	K N Dikshit	K N Dikshit(retired)	September 2009 Reassigned date May 2010
10	**Rakhigarhi, district Hissar, Haryana 1997-98 to 1999-2000**	**Amarendra Nath**	**Amarendra Nath (retired)**	April 2008 Reassigned date :December 2010

Small scale Excavations by retired officers

Sl. No.	Site, Period/s of excavation	Director of Excavation	Director of Excavation/Reporting Archeologist	Assigned date
1	Rupar, District Ambala,Punjab 1953-54 & 54-55	Y D Sharma	K N Dikshit(retired)	**May 2010**
2	**Mansar District Nagpur, Maharashtra 1994-95,95-96**	**Amarendra Nath**	**Amarendra Nath(retired)**	**April 2008 Reassigned date September 2010**

Cases of submitted reports
Large scale Excavations

Sl. No.	Site, Date of completion of excavation & Period of excavation	Reporting archaeologist	Work assigned date	Status
1	Satdhara, District Raisen 1993-94,95-96 to 97-98,99-00	Narayana Vyas, SA, Temple Survey Project (North)	June 2005	**Report submitted in March 2008**
2	Udayagiri, District Jajpur, Orissa 1985-86,86-87,87-88,88-89,97-98 to 2001-02	B. Bandyopadhyay, SA, Kolkata Circle	April 2005	**Report submitted and published in 2007**
3	**Lalitgiri, District Cuttack, Orissa** **1985-86 to 1990-91**	**JK Patnaik, ASA, Konark Musuem**	**April 2005**	**Report submitted in February 2010**

List of cases of submitted reports
Small scale Excavations

Sl. No.	Site, Date of completion of excavation & Period of excavation	Reporting archaeologist	Work assigned date	Reasons why pending
1.	Shri Suryapahar, District Goalpara, Assam 1992-93,93-94,95-96 to 2000-01	Jitendra Das, SA, Hyderabad Circle	April 2005	**Report has been submitted in March 2009**
2.	Lal Kot & Qila Rai Pithora, Delhi 1957-58, 58-59,59-	B.R. Mani, Jt. Director General	January 2005	**Report has been submitted in May 2007**

Sl. No.	Site, Date of completion of excavation & Period of excavation	Reporting archaeologist	Work assigned date	Reasons why pending
	60,64-65,91-92 to 94-95			
3.	Chandore, District South Goa, Goa 1999-91, 2000-01,01-02	J.V.P. Rao (now expired)	June 2004	**Report has been submitted**
4.	Hathab, District Bhavanagar **2001-02,02-03**	Shubhra Pramanik, SA, NMMA.	April 2005	**Report has been submitted in May 2007**
5.	Lachhura Distt. Bhilwara, Rajasthan 1997-98, 98-99	B.R. Meena, SA (BSP), Delhi	-	**Report has been submitted in May 2007**
6.	Kanaganahalli, District Gulbarga 1993-94,96-97,97-98,99-00,00-01,01-02	K.P. Poonacha, Director (Museum & Antiquity)	June 2005	**Report has been submitted in May 2010**
7.	Bekal Fort, District Kasargode 1997-98 to 2001-02	Nambirajan, Thrissur Circle	October 2006	**Report has been submitted and published in 2009**
8.	Besnagar, District Vidisha Madhya Pradesh 1963-64 to 1965-66, 1975-76, 76-77	Narayan Vyas, SA, Temple Survey Project (North)	June 2005	**Report has been submitted in March 2009**
9.	Khajuraho, District Chhatarpur 1980-81, 81-82,82-83,85-86 to 88-89	P.K. Mishra, SA, Patna Circle	June 2005	**Report has been submitted in May 2010**
10	Mamallapuram, Distt. Kanchipuram,Tamil Nadu 1990-2000 to 2000-01	K.T. Narasimhan, SA (now retired)	-	**Report has been submitted in January 2006**
11.	Sanchi, District Raisen, Madhya Pradesh 1993-94, 95-96 to 97-98, 99-00	A.K. Sinha, SA, Monument and Shri S.B. Ota, SA, National Mission	April 2005	**The work has been reassigned to Shri Narayana Vyas, SA, Temple Survey Project, North and report submitted in September 2008**
12	Golbai Sasan, Golbai, District Puri, Orissa 1990-91 to 91-92	A.K. Patel, Dy.SA, Raipur Circle	September 2006	**Report has been submitted in December 2007**

Sl. No.	Site, Date of completion of excavation & Period of excavation	Reporting archaeologist	Work assigned date	Reasons why pending
13	Dhalewan, District Mansa, Punjab 1999-2000, 01-02	Madhubala, SA, Excavation Branch-II	April 2005	**Report has been submitted in March 2011**
14	Ojiyana, District Bilwara, Rajasthan 1999-2000 to 2000-01	B.R. Meena, SA and Dr. Alok Tripathi	January 2005	**Report has been submitted**
15	Gudiyam, District Tiruvallore 1962-63, 63-64	S.B. Ota, Director, National Mission	August 2006	**Report has been submitted in August 2008**
16	Boxanagar, District West Tripura 2001-02	Jamal Hassan, SA, Dehradun Circle	June 2005	**Report has been submitted in May 2008**
17	Bhita, District Allahabad, Uttar Pradesh 1995-96, 1996-97, 97-98	Shri Induprakash, ASA and A.A. Hashmi, AA, Lucknow Circle, in February 2007.	June 2005	**Report has been submitted in July 2009**
18	Birchabilli Tila, District Agra, Uttar Pradesh 1999-2000	D.V. Sharma, SA, Delhi Circle	January 2005	**Report has been submitted in May 2008**
19	Tamluk, District Midnapur, West Bengal 1954-55,73-74	S.B. Ota, Director, National Mission	August 2006	**Report has been submitted in June 2008**
20	Shyamsundar Tila, Distt. South Tripura 1984-85,98-99 to 2000-01	G.C. Chauley, (retired)	-	**Report has been submitted in December 2005**
21	Thakurani Tila, Paschim Pilak, Distt. South Tripura	G.C. Chauley, (retired)	-	**Report has been submitted in 2005**
22	**Gufkral, District Pulwama, J&K 1981-82**	**A K Sharma(Retd)**	**-**	**Report Submitted in October 2008**

Annex 5.3
(Refer Para 5.8.1)

List of Cases where Excavation/Exploration Reports have been Submitted

Field season 2007-08

S. No	Name of the site	Office	Director	Nature of work	Status of Report
1.	Barabati Fort, District Cuttack, Orissa	Excavation Br.IV, Bhubaneswar	P.K. Trivedi	Excavation	Report submitted
2.	Exploration from Kaushambi to Kapilvastu with trial trenching and section scrapping.	Lucknow Circle	I.D. Dwivedi	Exploration	Report submitted

Field season 2008-09

1.	**Exploration at Sairang Lul, tributary of Tlawng / Dhaleswari river District Lushai Hills, Mizoram (1/14/2008-EE)**	**Prehistory Br. Nagpur**	**D. Bhengra**	**Exploration**	**Report submitted**
	Archaeological exploration to establish the Pilgrimage Route from Kaushambi to Kapilvastu Districts Kaushambi, Allahabad, Pratapgarh, Sultanpur, Faizabad, Ambedkar Nagar, Gonda, Basti, Santkabir Nagar, Balrampur, Sravasti, Siddharth Nagar, U.P.	Lucknow Circle	I.D. Dwivedi	Exploration	Report submitted

Field season 2009-10

S.l No.	Proposals	Office	Director	Nature of work	Remarks
1.	Excavation at Bangarh, Gangarampur, District South Dinajpur, West Bengal.	Kolkata Circle	T.J. Baidya	Excavation	Report submitted
2.	Excavation at Lathiya, Near Jamania, District Gajipur, U.P.	Ex. Br. III, Patna	B.R. Mani	Excavation	Report published in IAR
3.	Sengallur & Vadakipatti, Manapparari, Tiruchirappalli, Tamil Nadu	TSP (SR), Chennai	D. Dayalan	Excavation	Report submitted
4	Exploration to establish the Pilgrimage Route from	Lucknow Circle	I.D. Dwivedi	Exploration	Report submitted

S.l No.	Proposals	Office	Director	Nature of work	Remarks
	Kaushambi to Kapilvastu with trial section scrapping / trenching in Districts Kaushambi, Allahabad, Pratapgarh, Sultanpur, Faizabad, Ambedkar Nagar, Gonda, Basti, Sant Kabir Nagar, Balrampur, Sravasti, Sidhharth Nagar in (U.P.)				
5	Exploration in the right bank of Middle Mahanadi Valley from Banki to Sonepur, Orissa	Ex. Br.IV, Bhubaneswar	G. Maheswari	Exploration	Report Submitted
6	Exploration of Kadwaha, District Ashok Nagar, Madhya Pradesh	TSP, Bhopal	K. Lourdusamy	Exploration	Report Submitted
7	Survey of cave temples of early Pandyas, Muttarayars, Irrukkuvels, other Feudatories & Chieftains under the Pandyas.	TSP, Chennai	D. Dayalan	Architectural Survey	Report Submitted

Field season 2010-11

Sl No	Proposals	Office	Director	Nature of work	Remarks
1.	Excavation at Bangarh, Gangarampur, District South Dinajpur, West Bengal. (1/45/2/2005-EE)	Kolkata Circle	T.J. Baidya	Excavation	Report submitted
2.	Exploration in the right bank of Middle Mahanadi Valley from Banki to Sonepur, Orissa	Ex. Br.IV, Bhubaneswar	G. Maheswari	Exploration	Report submitted

Annex 6.1
(Refer Para 6.5.1)

Methods of Maintaining Accession Registers

Sl. No.	Name of Museum	System of managing the accession register
1.	National Museum	Maintaining the centralised accession register as well as separate registers for different wings/items. Accession registers were not properly maintained. Discrepancies were noticed in the accession register of manuscript section due to which the charge of this section was not taken over by the present incumbent from the then curator though he retired in March 2008.
2.	Indian Museum	Maintaining the items wise/wing wise accession registers and not the centralised accession registers. Accession registers were not complete. In many cases the details of age and location of the objects and their conditions were not recorded. Sometimes there were no running numbers in the accession registers making it difficult to ascertain the total holdings of objects by the Museum. Unique numbers were not assigned to any of the objects. Different sections have their own accession numbers which has resulted in repetitions in accession numbers inter-se.
3.	Victoria Memorial Hall	Maintaining the centralised accession register as well as separate registers for different wings/items. 5000 objects acquired from Rabindra Bharati Society as enduring loan during 2011 had not yet been accessioned although the same was to be completed by 31 March 2011.
4.	Asiatic Society, Kolkata	Maintaining the items wise/wing wise accession registers and not the centralised accession registers. Many objects were pending to be accessioned in the respective registers or database long after its acquisition e.g., 55 objects, out of which 19 manuscripts, were found in the stock register which were still pending to be accessioned. These objects were found from the cupboard of the Society during 2009 which were not recorded anywhere. Out of the total art objects of 54655, 15205 (28 *per cent*) were not accessioned.
5.	Allahabad Museum	34000 objects (48 *per cent*) out of the total of 70121 objects were not accessioned.

Annex 6.2
(Refer Para 6.7)

Details of the Physical Verification of Artifacts

Indian Museum	Physical verification in Museum was started in 2005. The time limit was extended several times and presently extended till October 2013. However it was noticed that only 38 *per cent* of the art objects were verified till March 2012.
National Museum	The last physical verification of art objects of National Museum was carried out by a Committee of experts from 1998-2003 and submitted their report in 2004 on the directions of court orders. Many discrepancies were pointed in the expert committee report. No physical verification was carried out after 2003.
Asiatic Society, Kolkata	All the objects were verified except the rare silver and copper coins. Numbers of such coins were not known to the Society as those coins had never been counted and physically verified.
Victoria Memorial Hall	The experts Committee for verification generally formed to confirm authenticity, genuineness and other aspects attributable to the objects. But out of 28394 art objects, 18979 remained unverified in respect to its antique and intrinsic value.
National Museum	The manuscripts section had a collection of 14143 manuscripts (8718 of Arabic & Persian and 5425 of Sanskrit). We physically verified manuscripts, selected randomly and found many shortcomings/missing in number of manuscripts entered in accession register and that actually existed.
Site Museum	However, during audit we ascertained that many Site Museums like Hazarduari Palace Museum (Kolkata Circle), Tamluk Museum (Kolkata Circle), Ropar Museum (Chandigarh Circle), Cooch Behar Palace Museum (Kolkata Circle), Nagarjunakonda Museum (Hyderabad Circle), Hampi Museum (Bengaluru Circle), Nalanda Museum (Patna Circle) had not conducted physical verification in last 5 years. In fact, in Nagarjunakonda Museum the physical verification was last conducted in 1997, in Nalanda in 1999 and in Hampi Museum in 2004. The risk of loss of theft of antiquities from these museums cannot be ruled out by us. There was no system of physical verification in CAC.

Annex 6.3
(Refer Para 6.13.4)

List of Monuments in Jaipur Circle where Antiquities were Scattered

S No	Monuments	Place	District
1.	Fort of Chittaurgarh	Chittaurgarh	Chittaurgarh
2.	Fort of Kumbhalgarh	Kumbhalgarh	Rajasamand
3.	Yupa Pillars	Badwa	Baran
4.	Jogni-Jogna Temple	Dholpur / Sone- ka – Gurja	Dholpur
5.	Ancient Ruins	Dalsanagar (Gangadhar)	Jhalawar
6.	Old Temples, Statues and Inscriptions	Shargarh	Baran
7.	Ancient Ruins and Structural Remains	Krishnavilas	Baran
8.	Old Temples near the Chandrabhaga	Jhalrapatan	Jhalawar
9.	Temple, Fort Wall and Statues	Dara or Mukandara	Kota
10.	Temple of Shiv and Kund	Badoli	Chittaurgarh
11.	Sas Bahu Temples	Nagda	Udaipur
12.	Siva temple and ruins	Arthuna	Banswara
13.	Fort, Mandor	Mandore	Jodhpur
14.	Ancient Site	Lodruva Patan	Jaisalmer
15.	Kala Pahar Temple	Todarai Singh	Tonk
16.	Pipa ji's Temple	Todarai Singh	Tonk

Annex 9.1
(Refer Para 9.1.1)

Details of Encroachment at Monument

Name of the Circle	States where Monuments are located	Number of the Monument which is encroached	Cases of Encroachment by Government Department
Agra	Uttar Pradesh	13	2
Aurangabad	Maharashtra	17	1
Bengaluru	Karnataka	10	Nil
Bhopal	Madhya Pradesh	4	Nil
Bhubaneswar	Odisha	15	1
Chandigarh	Punjab	15	5
Chennai	Tamil Nadu	30	Nil
Dehradun	Uttarakhand	1	1
Delhi	Delhi	21	2
Dharwad	Karnataka	13	
Guwahati	Assam	5	3
Hyderabad	Andhra Pradesh	27	Nil
Jaipur	Rajasthan	237	6
Kolkata	West Bengal	6	Nil
Lucknow	Uttar Pradesh	66	7
Mumbai	Maharashtra	14	4
Patna	Bihar/Uttar Pradesh	17	1
Raipur	Chhattisgarh	5	Nil
Srinagar	J&K	18	11
Trissur	Kerala/Tamil Nadu	2	1
Vadodara	Gujarat	20	1
		546	**46**

Annex 9.2
Details of Unauthorised Construction at Monument
(Refer Para 9.1.2)

Name of the circle	States where Monuments are located	No. of unauthorised construction	Government agency (out of figures indicated in Col No 3)
Aurangabad	Maharashtra	633	36
Bengaluru	Karnataka	1343	-
Bhopal	Madhya Pradesh	1550	-
Chandigarh	Punjab	612	-
Dehradun	Uttarakhand	377	-
Delhi	Delhi	723	23
Dharwad	Karnataka	358	-
Goa	Maharashtra	43	-
Hyderabad	Andhra Pradesh	1123	11
Jaipur	Rajasthan	239	-
Kolkata	West Bengal	76	-
Lucknow	Uttar Pradesh	1290	-
Mumbai	Maharashtra	200	14
Patna	Bihar/Uttar Pradesh	343	-
Raipur	Chhattisgarh	54	-
Ranchi	Jharkhand	3	-
Shimla	Himachal Pradesh	155	14
		9122	**98**

Annex 9.3
(Refer Para 9.3.1)

Details of Monuments where no Security Personnel were Deployed

Sl. No.	Name of Circle	States where Monuments are located	Number of Monuments where Security personnel was not deployed
1.	Agra	Uttar Pradesh	55
2.	Aurangabad	Maharashtra	3
3.	Bengaluru	Karnataka	30
4.	Bhopal	Madhya Pradesh	284
5.	Bhubaneswar	Odisha	4
6.	Chandigarh	Punjab	123
7.	Chennai	Chennai	158
8.	Dehradun	Uttarakhand	1
9.	Delhi	Delhi	106
10.	Dharwad	Karnataka	153
11.	Goa	Maharashtra	7
12.	Guwahati	Assam	47
13.	Hyderabad	Andhra Pradesh	118
14.	Jaipur	Rajasthan	3
15.	Kolkata	West Bengal	35
16.	Lucknow	Uttar Pradesh	80
17.	Mumbai	Maharashtra	6
18.	Patna	Bihar/Uttar Pradesh	180
19.	Ranchi	Jharkhand	7
20.	Raipur	Chhattisgarh	16
21.	Srinagar	J&K	39
22.	Trissur	Kerala/Tamil Nadu	13
Total			**1468**

Annex 10.1
(Refer Para 10.2 and 10.3.1)

Details of Public Amenities Available at the Monuments

Sl. no.	Name of the circle	Name of the state	Number of monuments	Drinking water available	Toilet available	Wheel chair available	Ramp available	Proper signboard available	Cultural Notice Board displayed at monument	Availability of Compliant register
1.	Agra	Uttar Pradesh	60	22	11	7	9	40	12	8
2.	Aurangabad	Maharashtra	168	79	3	1	1	5	13	6
3.	Bengaluru	Karnataka	208	78	20	10	3	209	181	Nil
4.	Bhopal	Madhya Pradesh	292	141	136	88	88	108	124	Nil
5.	Bhubaneswar	Odisha	78	5	5	3	1	78	78	5
6.	Chandigarh	Punjab	58	12	18	8	Nil	15	17	Nil
7.	Chennai	Chennai	104	12	18	11	1	26	14	2
8.	Dehradun	Uttarakhand	30	15	22	3	3	3	No	Nil
9.	Delhi	Delhi	106	7	7	4	4	43	48	3
10.	Dharwad	Karnataka	299	43	35	20	20	192	60	142
11.	Goa	Maharashtra	21	7	6	3	4	21	21	Nil
12.	Guwahati	Assam	79	21	22	2	Nil	65	44	4
13.	Hyderabad	Andhra Pradesh	37	8	7	3	3	35	2	NA

Sl. no.	Name of the circle	Name of the state	Number of monuments	Drinking water available	Toilet available	Wheel chair available	Ramp available	Proper signboard available	Cultural Notice Board displayed at monument	Availability of Compliant register
14.	Jaipur	Rajasthan	122						80	
15.	Kolkata	West Bengal	136	77	36	10	2	115	106	No
16.	Lucknow	Uttar Pradesh	83	28	14				32	
17.	Mumbai	Maharashtra	24	27	11	1	1	11	11	6
18.	Patna	Bihar	182	13	18	5	Nil	148	65	Nil
19.	Raipur	Chhattisgarh	47	25	8	4	1	40	2	8
20.	Shimla	Himachal Pradesh	40	23	5	1	Nil	Nil	35	Nil
21.	Srinagar	J&K	38	15	16	1	2	8	28	NIL
22.	Trissur	Chennai	36	19	10	14	10	36	32	9
23.	Vadodara	Gujarat	213	3	3	15	15		148	
			2461	**680**	**431**	**214**	**168**	**1198**	**1153**	**193**

Annex 10.2
(refer Para 10.3.3.1)

Publication Material lying Unused

Sl. No.	Circle	Number of books lying unsold
1.	Rajasthan	45543
2.	Thaneswar, Chandigarh	10676
3.	Odisha	54774
4.	Hyderabad	87771
5.	Bengaluru	21883
6.	Dharwad	26963
7.	Kolkata	50215
8.	Guwahati	10303
	TOTAL	308128

GLOSSARY

ASI	Archaeological Survey of India
AAT Act	Antiquities and Art Treasure Act
AAT Rules	Antiquities and Art Treasure Rules
ACWHM	Advisory Committee on World Heritage Matters
ADG	Additional Director General
AKTC	Aga Khan Trust for Culture
AM	Allahabad Museum
AMASR (Amendment and Valediction Act)	The Ancient Monuments and Archaeological Sites and Remains Act, (Amendment and valediction Act) 2010
AMASR Act	The Ancient Monuments and Archaeological Sites and Remains Act,1958
AMASR Rules	Ancient Monuments and Archaeological Sites and Remains Act, 1958
ASA	Assistant Superintending Archaeologist
ASI, HQ	Archaeological Survey of India Headquarters
ASK	Asiatic Society, Kolkata
ASM	Asiatic Society, Mumbai
AWC	Accounts Work Code
BIMSTEC Countries	Bangladesh Nepal Bhutan Sri Lanka Thailand India and Myanmar
BRDC	Bekal Resorts Development Corporation
CA	Conservation Assistant
CAA	Central Asian Antiquities
CABA	Central Advisory Board of Archaeology
CAC	Central Antiquity Collection
CBI	Central Bureau of Investigation
CCMP	Comprehensive Conservation Management Plan
CCTV	Closed Circuit Television
C-DAC	Centre for Development of Advanced Computing
CISF	Central Industrial Security Force
CPWD	Central Public Works Department
CREDA	Chhattisgarh State Renewal Energy Development Agency
CSMVS	Chattrapati Shivaji Maharaj Vastu Sanghralya
CVC	Central Vigilance Commission

DG	Director General
DPAS	Delhi Pradeshik Aggarwal Sammelan
DSA	Deputy Superintending Archaeologist
DSAC	Deputy Superintending Archaeological Chemist
DSH	Deputy Superintending Horticulturist
Dy. SA	Deputy Superintending Archaeologist
EFC	Expenditure Finance Committee
EOI	Expression of Interest
FIR	First Information Report
GIS	Global Information System
GOI	Government of India
GPR	Ground Penetrating Radar
GPS	Global Positioning System
GVO	Global Vaish Organisation
HDPM	Hazarduari Palace Museum
IAR	Indian Archaeology a Review
ICCROM	International Centre for the study of Preservation and Restoration of Cultural Property
ICOMOS	International Council of Monuments and Sites
IFD	Integrated Finance Division
IGNCA	Indira Gandhi National Centre for Arts
IM	Indian Museum
IMP	Integrated Management Plan
INTACH	Indian National Trust for Art and Cultural Heritage
ISP	Indian Security Press
IUCN	International Union for Conservation of Natural and Natural resources
JBIC	Japan Bank for International Cooperation
JDG	Joint Director General
JICA	Japan International Cooperation Agency
MIS	Management Information System
MoU	Memorandum of Understanding
MTDC	Maharashtra Tourism Development Corporation
NAC	Non antiquity Certificate
NCF	National Cultural Fund
NCSM	National Council of Science Museums

NCT	National Capital Territory
NEERI	National Environmental Engineering Research Institute
NGMA	National Gallery of Modern Art
NGO	Non Government Organisation
NM	National Museum
NMA	National Monument Authority
NMMA	National Mission on Monuments and Antiquities
NOC	No Objection Certificate
NRLC	National Research Laboratory for Conservation of Cultural Property
OUV	Outstanding Universal Value
PAO	Pay and Accounts office
PIC	Project Implementation Committee
PRI	Permanent Representative of India
RBS	Rabindra Bharati Society
RCP	Revised Conservation Programme
RD	Regional Director
RSRDC	Rajasthan State Road Development Corporation
SA	Superintending Archaeologist
SAARC	South Asian Association for Regional Co operation (Bangladesh, Nepal, Bhutan, Sri Lanka, Pakistan, Maldives, Afghanistan and India
SAC	Superintending Archaeologist Chemist
SAE	Superintending Archaeological Engineer
SJM	Salar Jung Museum
SLIC	State Level Implementation Committee
SMP	Site Management Plan
SR	Special Repair
SSC	Staff Selection Commission
UNESCO	United Nations Educational Scientific and Cultural Organisation
V&A	Victoria and Albert Museum
VIP	Very Important Person
VMH	Victoria Memorial Hall
WHC	World Heritage Centre
WHS	World Heritage Site





